

CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF CITY PLANNING

FINAL

86.85E

600 CALIFORNIA STREET
FEDERAL HOME LOAN BANK OF SAN FRANCISCO
ENVIRONMENTAL IMPACT REPORT

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DRAFT ENVIRONMENTAL IMPACT REPORT

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INTRODUCTION

This introduction explains the process of tiering environmental impact reports, and describes tiering in relation to this Environmental Impact Report for the proposed 600 California Street project.

TIERED ENVIRONMENTAL IMPACT REPORT

Where a prior environmental impact report (EIR) has been prepared and certified for a program, plan, policy or ordinance, the lead agency for a later project that meets specified requirements must examine significant effects of the later project on the environment, with exceptions, by using a tiered report whenever feasible as determined by the lead agency. (See California Public Resources Code, California Environmental Quality Act (CEQA), Sections 21093 and 21094, including amendments effective January 1, 1986.)

The law states the Legislative intent, finding and declaring that:

Tiering of environmental impact reports will promote construction of needed housing and other development projects by 1) streamlining regulatory procedures, 2) avoiding repetitive discussions of the same issues in successive environmental impact reports, and 3) ensuring that environmental impact reports prepared for later projects which are consistent with a previously approved policy, plan, program, or ordinance concentrate upon environmental effects which may be mitigated or avoided in connection with the decision on each later project; [and] that tiering is appropriate when it helps a public agency to focus upon the issues ripe for decision at each level of environmental review and in order to exclude duplicative analysis of environmental effects examined in previous EIRs.

The law directs that, where a prior EIR has been prepared and certified as noted above, the lead agency shall examine significant effects of the later project on the environment by using a tiered EIR, except that the report on the later project need not examine those effects which were either mitigated or avoided as a result of the prior EIR, or examined

at a sufficient level of detail as a result of the prior EIR to enable those effects to be mitigated or avoided by site-specific revisions, the imposition of conditions, or other means in connection with the approval of the later project.

600 CALIFORNIA STREET

A tiered environmental impact report has been prepared, and is presented herein, for the proposed 600 California Street project pursuant to Sections 21093 and 21094 of CEQA. This EIR is tiered from the EIR for the Downtown Plan (EE81.3, Final EIR certified October 18, 1984). The cumulative impacts of the development forecast in the downtown C-3 districts of San Francisco to the year 2000, including this project, are addressed in the Downtown Plan EIR. That cumulative analysis is not repeated in the EIR for this project.

The EIR for 600 California Street identifies the project portion of the cumulative impacts forecast in the prior EIR. (The Downtown Plan EIR may be examined at the Department of City Planning, 450 McAllister Street, San Francisco; the San Francisco main library; and various branch libraries.)

The 600 California Street EIR analyzes project-specific impacts. It discusses potentially significant effects of the project that were not examined in the Downtown Plan EIR and includes applicable mitigation measures for site-specific effects.

I. SUMMARY

A. PROJECT DESCRIPTION

The Federal Home Loan Bank of San Francisco proposes to construct an office and retail building with three levels of subsurface parking that would step down from 18-stories or 244-ft. at California and Kearny Sts. to nine-stories, 138 ft.-tall at Sacramento and Kearny Sts. The Sacramento St. frontage would step down from Sacramento and Kearny to three-stories, 45 ft.-tall, at its western third. The project architect is Kohn Pedersen Fox Associates of New York, New York.

- The 31,822-sq.-ft. site includes Lots 3 and 26 of Assessor's Block 241; the block is
- bounded by California and Kearny Sts. in the Financial district, and Grant Ave. and Sacramento St. in Chinatown. The site is at the northwest corner of California and Kearny Sts. and is bounded by, California on the south, the Hartford Building and a two-story building on the west, Sacramento St. on the north, and Kearny St. on the east. The site is occupied by two buildings: a nine-story office building and a two-story, three level, parking garage. Both of the buildings would be demolished for the project. There are currently about 373 employees on the site.

- As calculated under the Planning Code, the building would contain about 352,000 gross sq. ft. of gross floor area; the gross floor area as defined by the Code would include the office area and that portion of the proposed parking area in excess of the seven percent of the gross floor area of the building permitted as an accessory use and the area in excess
- of the space proposed for replacement short-term parking spaces, which may be approved by the Planning Commission pursuant to Planning Code Section 309. This would result in a Floor Area Ratio (FAR), the ratio of the gross floor area of all building to a site (excluding space not included in the gross floor area, and thus not included in the FAR calculation, such as retail, accessory parking space and mechanical space) to site size, of about 11:1 for the 31,822-sq.-ft. development site. The overall FAR for the preservation and development lots would be less than, or equal to, 9:1.

The main building entrance would be on California St. Access to three at-grade truck loading docks, and sub-surface auto parking would be from Sacramento St. The loading area would include a truck turntable allowing trucks to completely turn around before exiting onto Sacramento St. Automobiles would exit from the sub-surface parking onto Kearny St. The three subsurface levels would contain about 232 parking spaces, 48 short-term, 82 long-term and 102 yet to be determined as short- or long-term spaces, storage and mechanical space. The ground floor would contain lobby, retail, a galleria open to California St. (connecting to the existing Hartford Building plaza), three truck loading docks and mechanical equipment. Floors two through 18, on the south portion of the building and two through nine, on the north portion, would contain office space; on top of the 18th floor of the south portion would be a landscaped rooftop terrace and a mechanical penthouse.

The building would include about 312,700 gross sq. ft. (gsf) of office space, 7,900 gsf retail, 10,400 gsf of open space (2,380 sq. ft. more than the 8,020 sq. ft. required), 21,100 gsf of mechanical and storage space, about 90,600 gsf (232 spaces) of parking, and three truck loading docks. The existing buildings on the site contain about 165,000 sq. ft. together, including 96,600 gsf of office and 68,400 gsf of parking (269 spaces). Total net changes in the floor area for the site would be net increases of about 216,100 gsf of office, 7,900 gsf of retail and 10,400 gsf of open space; a net decrease of 37 parking spaces (with a net increase of about 22,200 gsf); and an increase of up to three truck loading docks.

The project would incorporate about 65,700 sq. ft. of transferred development rights (TDRs) from as yet unidentified sites. The project height of 244 ft., plus a 22 ft. mechanical penthouse, for a maximum 266 ft. would comply with the height limit for the site, 250 ft. plus allowable extensions, a maximum of 291 ft. The project would require approval under Sections 309 and 321 of the City Planning Code. It would require allowable exceptions to exceed the maximum diagonal and length dimensions, maximum average floor area and volume reduction, all in the upper tower. The project would also require an allowable exception from the required 15 ft. setback from interior property lines, under Section 132.1 subsections (c)2A and (c)2B. The project would require Conditional Use authorization (City Planning Code Section 204.5 (c)) for parking in excess of the replacement short-term spaces and in excess of the seven percent of the gross floor area of the building permitted as an accessory use; if replacement short-term parking were not required by the Planning Commission as proposed, this parking would be

part of the Conditional Use application. Section 155(g) requires rate structures that favor short-term parking in the C-3 District. No exception is allowable under Section 309; the project sponsor has requested an opinion from the Zoning Administrator as to whether a long-term rate structure could be allowed by the variance procedure.

Demolition of the two existing buildings on the site, would take about 12 weeks. Construction would then continue for about 84 weeks, for a total expected 24 month construction period, until project completion and initial occupancy.

B. MAIN ENVIRONMENTAL EFFECTS

LAND USE AND ZONING (pp. 62 to 76)

The site is in the C-3-0 (Downtown Office) Use District, and a 250-S Height and Bulk District. The project would replace two buildings containing office, parking, and storage uses with office use at a greater intensity, new retail and open space uses, and a net decrease in the number of parking spaces. The project would be similar to land uses to the south, east and west in the immediate site vicinity consisting predominantly of high-rise office buildings, many of which are related to banking, finance and commerce, with some ground-level retail uses. The project would differ from land uses to the south, north and northwest which consist predominantly of low- and mid-rise commercial buildings characteristic of Chinatown, which is northwest of the site.

As required by the Planning Code, the project would provide art work and childcare in a manner to be determined. The required open space would be provided on the roof of the 18-story, south portion of the building and in the street-level galleria proposed for the California St. frontage. As stated above, the project would comply with the height requirements of the City Planning Code. The project would require an exception to the Planning Code regarding separation of towers as it would encroach into the area of the interior lot-line setback requirement on the west (Hartford Building) facade by about five ft., along the southern portion of the building. Exception to this requirement is allowable under the Planning Code (Section 132.1 subsection (c)2(A) and (c)2(B)), subject to approval under Section 309). The project would exceed the maximum length, maximum

diagonal, and maximum average floor area Bulk Limits for the upper tower zone. The project would exceed the the maximum length of 130 ft. for the upper tower by about 25 ft., the maximum diagonal dimension of 160 ft. by about ten ft., and the maximum average floor area of 12,000 sq. ft. by about 740 sq. ft. The project would have a volume reduction in the upper tower of about five percent; ten percent would be required. Exception to these bulk requirements is allowable in accordance with Section 272(a) 1, 3, 4 and 5 subject to approval under Section 309.

CULTURAL RESOURCES (pp. 76 to 77)

There is no evidence that prehistoric archaeological remains exist at the project site. The project site vicinity was first settled in the Spanish-Mexican (1776-1849) Period, and remained developed through the City Building Period (1858-1906), and the Twentieth Century Period (1906-present). Archival research indicates there is some possibility that artifacts from all three periods could be encountered at the site. The site was excavated for the current buildings to a depth of 10 ft. deeper than structures that occupied the site during earlier periods. Artifacts were, therefore, probably removed or destroyed. The proposed excavation to a depth of about 30 ft. would be about 18 ft. below the existing basement, however, and therefore, there is a possibility of encountering cultural artifacts from earlier periods, particularly the Gold Rush and City Building periods. Potential remains could include household utensils, lacquered wood boxes, fans, cloth, jewelry, spiced perfumes, soap and cooking utensils. Such a find could be considered of archaeological and historical significance.

URBAN DESIGN (pages pp. 77 to 93)

The project would demolish two buildings. Neither is rated by the Foundation for San Francisco's Architectural Heritage, or in the 1976 Department of City Planning Inventory, or designated for architectural merit in Categories I to IV or in a conservation district of the Downtown Plan.

The project would step down from about 244 ft. (excluding penthouse) in height at California and Kearny Sts. to 138-ft. at Kearny and Sacramento Sts. Two-thirds of the building, along the Sacramento St. frontage, would be 138-ft.-tall, and one-third would be 45-ft.-tall. The overall project would have a three-part vertical composition: an architectural base with open galleria, a middle shaft, and a top. The project would be

faced in light-colored masonry and stone. The 118-ft.-deep setback above the base from Sacramento St., at a height of 138 ft. (above street level at the Kearny/Sacramento intersection), of the north portion of the building, is intended to reduce the apparent height and bulk of the building along Sacramento St.

The 18-story portion of the building at California and Kearny Sts. would be visible against taller buildings in the background from viewpoints such as Powell at California Sts. (that is, from Nob Hill on the west), and Market St. at Third St. and along Kearny St. (to the south). The project would be shorter than other high-rises in the project area such as the Bank of America Building, the 580 California St. Building, the International Building, and the Hartford Building. It would be larger in scale and taller than existing small-scale, low- and mid-rise buildings west and north of the site, and in the same block in Chinatown.

SHADOW AND WIND (pp. 93 to 106)

The project would cast no new shadow on any Recreation and Park Department property during the hours defined by Proposition K and would thus comply with the Park Shadow Ban ordinance. The project would cast new shadow on streets, sidewalks and buildings in the project area.

- A wind tunnel test for the project indicates that existing wind speeds at nine of 22 test locations exceed the 11 mph equivalent wind speed pedestrian comfort criterion established in the Downtown Plan, and wind speeds at three locations exceed the seven mph seating area criterion. At one location, on the roof of the existing 600 California building, the 26 mph hazard criteria is exceeded with the current conditions. The project would cause wind speeds to increase at five test locations (by one to four mph), to remain the same at 11 locations, and to decrease at six locations (by one to eight mph). In the one test location along California St. that currently meets the 11 mph
- pedestrian comfort criterion, winds would increase to 15 mph, such that this criterion would be exceeded. Winds at four locations, would be reduced by the project, but would continue to violate the applicable comfort criteria. Two of these locations are pedestrian areas along California St., one is an existing seating area within St. Mary's Square, and one is the proposed rooftop terrace area. The hazard criteria would not be exceeded at
 - any of the locations tested, with the project in place. The project would require allowable

- exceptions to City Planning Code Section 148 for increased winds above 11 mph, noted above, and to continue existing exceedances of the comfort criteria as follows: to continue existing exceedances of the 11 mph criteria at nine other locations (the north side of California St. at the site's western boundary; the south side of California St. at the International Building's northwest boundary; the northeast, northwest, southeast, and southwest corners of the intersection of California and Kearny Sts.; the south side of California St. in front of the A. P. Giannini Plaza; and two locations within the A.P. Giannini Plaza), and to continue exceedances of the 7 mph criterion, on the rooftop of the proposed building, and at two locations in St. Mary's Square.

TRANSPORTATION (pp. 106 to 125)

A sidewalk detour and curb lane closure on the Kearny St. project frontage would be necessary during construction (about 24 months). Sidewalks on the project frontages along California and Sacramento Sts. would remain open during construction. Demolition and excavation (separate phases) would each generate an average of 10 truck trips per day. Construction truck traffic would not be permitted between 7 a.m. to 9 a.m. and 3:30 p.m. to 6 p.m. Construction traffic and closure of the curb lane on the west side of Kearny St. in front of the site would slow traffic, including Muni buses using Kearny St.

The project would generate about 5,095 net new person trips per day. About 725 new outbound trips would occur during the p.m. peak period, 450 of these during the p.m. peak hour.

The project would include about 232 independently accessible parking spaces (replacing the existing 269 valet spaces on site) and would result in a net decrease of about 37 spaces. The existing 269 spaces on the site are currently fully occupied. Eighty-two spaces would be long-term and 48 would be short-term; the remaining 102 spaces require Conditional Use authorization at which time the Planning Commission will also determine their status as short- and/or long-term spaces. Estimated equivalent net new daily parking demand from the project would be for about 190 equivalent daily spaces (in addition to the existing 269 spaces on site), resulting in an unmet parking demand as a result of the project of about 227 spaces (190-space net new project demand plus 269 existing spaces equals 459 minus 232 spaces with the project equals 227 spaces).

The proposed project would generate about 220 new pedestrian trips on the adjacent sidewalks during the noon 15-minute peak period and about 155 new pedestrian trips during the p.m. 15-minute peak period. Sidewalk operations, currently in the open, unimpeded and impeded ranges at locations adjacent to the project site during both the noon 15-minute peak period and p.m. 15-minute peak period, would remain in that range with the addition of the project to existing conditions; the project would cause existing conditions to worsen at four of the seven locations studied (from open to impeded at one, and unimpeded to impeded at three) in the noon hour peak and at two of the seven locations studied (both from unimpeded to impeded) during the p.m. peak hour.

The project would add about 170 outbound trips to Muni, 130 outbound trips to BART, and 95 new outbound trips to other transit agencies during the p.m. peak period in the year 2000. The project would generate an annual cost deficit to Muni of about \$42,340, which would be less than the project's contributions to the General Fund, the Transit Development Impact Fee, and sales tax revenues. The project would result in an annual net operating deficit to BART of about \$79,200. BART's operating deficit per passenger is likely to decline in real terms as planned service improvements become operational in the future.

The EIR for the Downtown Plan (EE81.3, Final EIR certified October 18, 1984, available for review at the Department of City Planning, the main San Francisco library and various branch libraries) forecast employment and development in the downtown C-3 districts to the year 2000, and evaluated the impacts of this forecast employment and development. Project effects would fall within this forecast. The summary statements below, and those in the Impacts Chapter regarding cumulative development, are drawn from that EIR. The lengthy and detailed analysis presented in the prior EIR will not be repeated in this EIR for the 600 California St. project. The relevant material in the Downtown Plan EIR is summarized and incorporated by reference in the appropriate section of the EIR, by topic.

The transit demand from the project would represent about 0.2% of the total transit demand in the year 2000. Cumulative development under the Downtown Plan to the year 2000 in conjunction with planned capacity increases of transit carriers would be expected to cause the following changes in transit levels of service during the peak period: Muni Northwest Corridor, E to D; BART Transbay, F to E; AC Transit, C to D; Golden Gate Ferry, B to A; Tiburon Ferry, A to B; and Caltrain, B to C.

With cumulative development by the year 2000, sidewalk and crosswalk operations would be in the unimpeded and impeded ranges for all locations studied for the project (the project pedestrian traffic would represent between 12% and 42% of the pedestrian volumes).

Cumulative development, including that from the proposed project, by the year 2000 would be expected to decrease the existing peak-hour vehicle Level of Service (LOS) from C to D at the intersections of both Sacramento and Kearny Sts. and Clay and Battery Sts. and from B to C at Sacramento St. and Grant Ave. Project traffic alone would not cause the LOS at any of the intersections to change.

The project would represent about 0.3% of total outbound regional auto demand on major corridors (bridges and freeways) in the year 2000. The project percent would not be measurable against day-to-day fluctuations in traffic volumes.

The C-3 District would generate demand for approximately 58,000 equivalent daily parking spaces in the year 2000 under the Downtown Plan, an increase of 28% from 1984. Short-term demand would continue to represent about 25% of the total demand. The project parking demand would represent about 0.3% of the total demand from the C-3 District. The parking supply has been assumed to be about 51,000 spaces. There would be a parking deficit of about 6,000 spaces in the year 2000 if vehicular demand occurs as projected. Alternatively, if the goals of the Downtown Plan are achieved, total parking demand in the year 2000 would increase by about six percent over 1984 and there would not be a parking deficit.

The City Planning Code would require three loading spaces or their equivalent for the project, and the project would provide three loading spaces. Access (and egress) to (from) the truck loading docks would be on Sacramento St. A truck turntable would be provided which would allow trucks to completely turn around off street.

AIR QUALITY (pp. 125 to 129)

Project-related vehicular traffic would add to cumulative regional pollutant emissions. Project-related traffic would contribute about one percent of total incremental emissions resulting from C-3 development projected in the Downtown Plan EIR. Emissions of total suspended particulates (TSP) generated by the project and cumulative development would increase TSP concentrations, which would increase the frequency of TSP standards violations in San Francisco, with concomitant health effects and reduced visibility.

Project emissions alone would not cause any standards to be violated. Currently, the eight-hour CO standard is estimated to be exceeded at the intersection of Battery and Clay Sts. However, local CO concentrations are predicted to be less in 2000 than in 1984, and would not violate the standards at Battery and Clay Sts., because the effects of emission controls on new vehicles would offset increases in traffic volumes and congestion.

CONSTRUCTION NOISE (pp. 129 to 132)

Project construction would take place over about 24 months, and would increase noise levels in surrounding areas. Highest average construction noise levels experienced in offices and stores near the site could interfere with speech. During excavation and exterior finishing, noise levels in the Nam Kue School and in residences in the project vicinity could reach as high as 76 dBA with windows open and 61 dBA with windows closed which could interfere with concentration. There would be no pile driving for the project.

EMPLOYMENT (pp. 132 to 136)

The project would accommodate about 847 net new employees in the C-3 District. There would be a net increase of about 798 office employees, a net increase of about 23 retail employees and a net increase of about 26 building maintenance/security employees. About 2,000 additional jobs in the Bay Area would result from the employment multiplier effect of project operation. The project would require about 130 person-years of construction labor. About 227 additional person-years of employment would be generated in the Bay Area, as a result of the multiplier effect of project construction.

RESIDENCE PATTERNS AND HOUSING (pp. 136 to 137)

The Downtown Plan EIR analyzed the effects of the C-3 employment growth on future housing market conditions. With forecast C-3 district employment growth, there would be approximately 30,000 more C-3 district workers living in San Francisco. As a result of San Francisco's continuing high housing costs, some existing and new residents would pay more for the same quality housing, and others would end up with lower quality housing; many would allocate a larger share of their resources for housing.

C-3 district workers did not represent large percentages of the total number of employed residents of the other Bay Area Counties in 1980/1981, and these percentages are expected to be very similar, although somewhat larger, in 2000. Because C-3 district employment growth is one of many factors affecting future housing market conditions, and because the increased numbers of C-3 district employees residing outside of San Francisco, when considered in the regional context of employment growth, are not great, the City Planning Commission, in certifying the Downtown Plan EIR, did not find a significant impact on the region's housing supply as a result of cumulative downtown growth.

GROWTH INDUCEMENT (pp. 137 to 139)

Increases in downtown office space from the proposed project would contribute to growth of local and regional markets for housing, goods and services. Although employment growth would not be reflected directly in increases in demand for housing and City services to residents, it is expected that some downtown workers would want to live in San Francisco, intensifying the demand for housing, retail goods and services. The project would locate office and business service jobs historically located in this area, in the C-3-0 District. The project would be built in a developed urban area, and would require no expansion to the municipal infrastructure not already under consideration.

C. MITIGATION MEASURES

Major measures identified that would mitigate potentially significant environmental effects include the following:

MEASURES PROPOSED AS PART OF THE PROJECT

- During the construction period, construction truck movement would not be permitted between 7 a.m. to 9 a.m. and 3:30 p.m. to 6 p.m. to minimize peak-hour traffic conflicts and to accommodate queueing of Muni buses on Kearny St. prior to the peak hours. The project sponsor and construction contractor would meet with the Traffic Engineering Division of the Bureau of Engineering of the Department of Public Works, the Fire Department, Muni and the Department of City Planning to determine feasible traffic mitigation measures to reduce traffic congestion during construction of this project and other nearby projects. To minimize cumulative traffic effects of lane closures during construction, the project sponsor would coordinate with construction contractors for any concurrent projects that are planned for construction or later become known.
- The project sponsor would contribute funds for maintaining and augmenting transportation service in an amount proportional to the demand created by the project, as provided by the Board of Supervisors Ordinance No. 224-81. Should said ordinance be declared invalid by the courts, the project sponsor has agreed to

participate in any subsequent equivalent mitigation measures adopted by the Planning Commission or the City in lieu thereof, which would apply to all projects similarly situated.

- The project sponsor would: 1) participate with other project sponsors and/or the San Francisco Parking authority in undertaking studies of the feasibility of constructing an intercept commuter parking facility in a location appropriate for such facility to meet the unmet demand for parking for those trips generated by the project which cannot reasonably be made by transit, and 2) participate with other project sponsors and/or the Municipal Railway in studies of the feasibility of the establishment of a shuttle system serving the project site and the parking facility.
- As recommended by the Environmental Protection Element of the San Francisco Master Plan, an analysis of noise reduction measures would be prepared by the project sponsor, and recommended noise insulation features would be included as part of the proposed building.
- The sponsor would hire an acoustical expert to monitor the interior noise levels of the Nam Kue School on one occasion, to determine which equipment would result in an interior noise level in excess of 55 dBA with windows closed; use of such equipment would be prohibited between 4 p.m. to 6 p.m. weekdays when classes are in session.

MEASURES THAT COULD BE IMPLEMENTED BY PUBLIC AGENCIES

- Through San Francisco Committee for Utility Liaison on Construction and Other Projects (CULCOP), PG&E could coordinate work schedules with other utilities requiring trenching, so that street disruption would take place at off-peak hours and on weekends, and at the same time that the street would be opened for construction of the project.
- The City could implement the transportation improvements described in the Downtown Plan. Cumulative transportation impacts within San Francisco would be reduced by the improvements, and to the extent that San Francisco could influence transportation improvements recommended by the Plan for areas outside the City, cumulative regional impacts caused by downtown growth would also be reduced.

D. ALTERNATIVES TO THE PROPOSED PROJECT

ALTERNATIVE A: NO PROJECT

This alternative would entail no change to the site. The proposed project would not be built there. The two existing buildings on the site, at 600 California St. and 551 Kearny St., would be retained, rather than demolished for the project.

This alternative could result in the development of other office space, possibly a high-rise building comparable to the project, at another location. Alternative development within the San Francisco downtown area would result in some of the same (or similar) impacts as described for the project. The effects of development would depend largely on the location chosen, and cannot be accurately determined. This alternative would preserve the option to develop a similar or different type of building on the site in the future.

ALTERNATIVE B: NO TRANSFER OF DEVELOPMENT RIGHTS, 9:1 FAR

This alternative considers a building without Transferred Development Rights (TDR), with an FAR of 9:1, the basic allowable FAR. This alternative would include about 223,500 gsf of office space (126,900 gsf net new), as compared to 312,700 gsf (216,100 gsf net new) for the project. Mechanical and storage space would be about 20,100 gsf, compared to 21,100 gsf for the project. Retail and parking space would be the same as for the project. Open space would be about 8,800 gsf compared to 10,400 for the project, in a rooftop terrace and in the galleria along California St. as for the proposed project. This alternative would satisfy all Downtown Plan requirements including on-site publicly visible art work, open space, and childcare. In design, the alternative would be bulkier in appearance than the proposed project, in part, because the project would be stepped. This alternative would be about 132-ft. tall or 112 ft. shorter than the project (244-ft. tall) at Kearny and California Sts. and would be 132-ft. tall at Kearny and Sacramento, or about six feet shorter than the project (138-ft.). This alternative would be of uniform height over the entire site. Shadow from this alternative would be about 46% shorter than that of the project from the California/Kearny portion of the building, and about four percent shorter than that of the project from the Kearny/Sacramento St. portion of the building. As the alternative would be eight stories shorter than the project at the California/Kearny portion of the building, it would be less visible.

Air quality, energy and transportation effects would be about 28% less than those of the project. The construction period would be shorter because the building would be smaller, and thus construction noise effects would also occur for a shorter period of time. Any effects on cultural resources would be similar to those of the proposed project. Wind effects from this alternative would be greater at 13 of the locations tested, the same at seven locations and less at two locations than the project. This alternative would provide employment for about 882 employees (509 net new employees), compared with about 1,220 employees (847 net new employees) for the proposed project.

ALTERNATIVE C: NO PARKING

This alternative would have no auto parking spaces; other uses, building dimensions and floor areas would be as for the project. However, because this alternative would have no parking, and thus, no parking that would exceed the seven percent allowed as accessory parking, the FAR would be less than the project, 10:1 compared to 11:1 with the project. The alternative would have one basement level, compared to three for the project.

The proposed project would reduce parking on the site by about 37 spaces. This alternative with no on-site parking would result in less traffic at local intersections. The unmet parking demand of the alternative would be 232 equivalent spaces greater than that of the project.

This alternative would have less potential for disturbance of any subsurface cultural resources, as one basement level would be needed for the new tower, rather than three. All other impacts of this alternative would be the same as those of the project.

ALTERNATIVE D: NO EXCEPTION TO PLANNING CODE, SEPARATION OF TOWERS OR BULK REQUIREMENTS

This alternative would include setbacks above the base on the western, interior-of-block property line as called for in Section 132.1(c) Separation of Towers. The proposed project would intrude into the required 15-ft. setback by five feet where the mechanical core would be located on the western interior property line. This alternative would be set back 15 ft. from the western interior property line; the project would be set back ten ft. (at its nearest point) instead of the required 15 ft. from the western interior property line. This

alternative would meet all bulk requirements in the lower and upper towers and would include the required volume reduction in the upper tower. (The project would exceed all bulk requirements in the upper tower except maximum floor area, and would provide less than the required volume reduction in the upper tower).

This alternative would include about 317,500 sq. ft. of office, about 10,700 sq. ft. of open space (compared with 312,700 sq. ft., and 10,400 sq. ft., respectively, for the project) with the same amount of retail and parking space as the project. This alternative would have an FAR of 12:1 (compared to 11:1 for the project). This alternative would have a maximum height of 279 ft. at the southern portion of the building and 104 ft. at the northern portion of the building (compared to 244 ft. and 138 ft., respectively, for the project). Traffic, air quality and energy effects of this alternative would be about the same as those of the project. Shadow effects of this alternative would be greater than those of the project, as it would be 35 ft. taller than the project on California and Kearny Sts. Noise impacts and any impacts on cultural resources would be the same as for the project. Wind effects of this alternative would be greater at 14 of the locations tested, the same at three locations and less at five locations than the project. This alternative would provide employment for about 1,235 employees (862 net new employees) compared with about 1,220 employees (847 net new employees) for the proposed project.

- **ALTERNATIVE E: REDUCED BUILDING HEIGHT ALONG SACRAMENTO ST. WITH A 60-FT. DEEP SETBACK ABOVE**
- **ALTERNATIVE E1: BUILDING HEIGHT OF 50-FT. AT SACRAMENTO ST. WITH A 60-FT. DEEP SETBACK ABOVE**

This alternative would be 50 ft. tall at Sacramento and Kearny stepping up to about 164 ft. tall, 60 ft. south of Sacramento St. along the Kearny St. frontage, then stepping up to about 244 ft. tall, 110 ft. from Sacramento St. The Sacramento St. frontage of this alternative would all be at a height of 50 ft. The project would be 138 ft. tall stepping up to 244 ft. tall, about 118 ft. south of Sacramento St. along the Kearny St. frontage. The project, in comparison, would step down from 138 ft. to 45 ft. about 85 ft. from Kearny St. along the Sacramento St. frontage; that is, about two-thirds of the Sacramento frontage would be 138 feet tall and one-third would be 45 feet tall.

This alternative would include about 319,800 sq. ft. of office, and about 10,100 sq. ft. of open space (compared with 312,700 sq. ft. and 10,400 sq. ft. respectively for the project). Retail space and other features of this alternative would be the same as for the project.

The FAR of this alternative would be about 12.0:1 compared to 11:1 for the project. This alternative would satisfy all Downtown plan requirements including on-site publicly visible art work, open space, and childcare, as would the project. Transportation, air quality, energy, noise and cultural resource effects would be about the same as for the project.

As noted above, the alternative design would include three steps along the Kearny St. frontage, instead of two with the project, and would maintain a lower height along Sacramento St. relating to the existing street wall height west and north of the site. Shadow effects would be similar to those of the proposed project. Wind effects of this alternative would be greater at 13 of the locations tested, the same at three locations and less at six locations than the project. This alternative would provide employment for about 1,240 employees (867 net new employees) compared with about 1,220 employees (847 net new employees) for the proposed project.

● **ALTERNATIVE E2: BUILDING HEIGHT OF 50-FT. ALONG SACRAMENTO ST. (RANGING FROM ABOUT 47-60 FEET) WITH A 60-FT. SETBACK ABOVE AND ALTERNATIVE PARKING SCHEME**

This alternative would be of similar design to Alternative E1 discussed on pp. 158 to 161 of the EIR except that it would step up in three steps instead of two from Sacramento to California on the Kearny St. frontage. This alternative would range from about 47-ft. at the west property line to about 60-ft. tall at Sacramento and Kearny Sts. with a 60-ft. setback above. The building would step up from 50 ft. to about 146-ft.-tall, along the Kearny St. frontage about 60-ft. south of Sacramento St., then step up again to about 240 ft. tall about 150 ft. south of Sacramento St. (See Figures 31A and 31B, pp. 161a and 161b). The 240-ft.-tall portion would not be designed with three vertical components as with Alternative E1. The entire Sacramento St. frontage would range from about 47-ft. to about 60-ft.-tall, and thus be more similar to the existing street wall height along Sacramento St. west and north of the site than the project. This alternative would include about 313,100 sq. ft. office, up to 10,000 sq. ft. retail, 130,600 sq. ft. of parking loading, mechanical storage etc, (compared to 312,700 sq. ft. office, 7,900 sq. ft. retail, and 131,600 sq. ft. of parking, loading, mechanical and storage for the project). The open space requirement of 7,537 sq. ft. (compared to 8,020 sq. ft. for the project) would be met partially on-site in a ground floor galleria along California St. and off-site through the development of new open space at St. Mary's Square (similar to Option B in Alternative F,

but not including air rights from the International building). The building would contain about 400 sq. ft. more office space than the proposed project. The total number of parking spaces would be the same as with the proposed project (232 spaces). Of these, 50 would be proposed long-term, 48 proposed replacement short-term, 15 short-term spaces proposed to meet the demand generated by the building, with an additional 119 proposed short-term spaces, all subject to consideration and approval by the City Planning Commission. The parking and loading access and egress for this alternative would differ from the proposed project and Alternative E1. Under Alternative E2 all cars would enter on Sacramento and exit on Kearny, all trucks would enter and exit on Kearny (compared to all cars entering on Sacramento and exiting on Kearny, and all trucks entering and exiting on Sacramento with the project). A truck turntable would not be provided unless required by the Planning Commission as a condition of approval to eliminate potential truck back-ups onto Kearny St.

The FAR of this alternative would be about the same (11:1) as with the project. This alternative would require about 64,256 sq. ft. of TDR (compared to 65,700 sq. ft. for the project). This alternative would have greater maximum diagonal lengths in the upper tower and would require an exception from the City Planning Code separation of towers and bulk limits for the upper and lower towers as with the project. Other features such as building materials and facade ornamentation of this alternative would be as for the project.

This alternative would be about 88-ft. shorter than the project at Sacramento and Kearny Sts. (for 60 ft. south of Sacramento St.) and about the same height as the project for the southern portion of the building (about two-feet shorter). This alternative would include three steps in the building, as opposed to two with the project (see Figures 31A and 31B, pp. 161a and 161b). It would be less prominent than the project in mid- and long-range views from the north, northeast and northwest, and would be of similar prominence from other viewpoints. This alternative would be more similar to the existing streetwall height, north and west along Sacramento St. in Chinatown, compared to the project which would be more than three times the height of the existing streetwall along Sacramento St.

Shadow effects would be similar to those of the proposed project at most times of the year due to the similar height of this alternative (242 ft.) on the southern portion of the building. In most instances, shadow would be less with this alternative than with the project with the following exceptions: At noon in December additional shadow would be added in the intersection of Clay and Kearny Sts. In March at noon and in September (one hour later) shadow would increase along Kearny at the northwest corner of Kearny and Sacramento Sts. affecting about 40 ft. of sidewalk length and 15 ft. of crosswalk. June 21 at 3 pm, shadow would increase along a length of approximately 20 ft of sidewalk on the east side of Kearny just south of Sacramento St./1/ A shadow analysis for this alternative is on file and available for review at the Department of City Planning, Office of Environmental Review, 450 Mc Allister St.

During the process of preparing a report evaluating the shadow effects of this alternative in relation to Proposition K, the Park Shadow Ban Ordinance, it was determined that shadow from the alternative could potentially reach the Chinese Playground and shade a narrow strip at its southwestern edge/corner. The effect would occur for about one minute on about five days starting about March 31, at about one hour after sunrise (7 am in March, 7:50 am in September) and for a similar time starting September 11. The project sponsor has stated that the facade of the building would be modified, if necessary, to eliminate this effect./2/ The change, if needed, would involve a slight alteration to the facade of the northeast corner of the southernmost tower (roughly two and one-half ft. by 12 ft. wide and 30 ft. vertically). This change would not be noticeable at the scale of the drawings and photomontage prepared for this alternative./3/

Wind effects of this alternative would be about the same as for Alternative E1. Compared to existing conditions, Alternative E2 winds would be greater at nine of the locations tested, the same at six locations and decreased at seven locations. The required 7,537 gsf of open space for this Alternative would be met partially on-site in a galleria along California St. and partially off-site at St. Mary's Square. (similar to Option B of Alternative F, but not including air rights from the International building). This alternative would meet the Planning Code requirement for art, as would the proposed project. This alternative would provide employment for about 1,227 employees, compared to about 1,220 employees for the proposed project. It would generate a demand for about 84 new dwelling units in San Francisco, based on the OAHPP formula, the same as with the project.

Under this alternative all cars would enter from Sacramento St. and exit onto Kearny St. and trucks would enter and exit on Kearny St. This alternative would alter local circulation in comparison to the project as a result of the change to truck loading access. Traffic would decrease slightly from that expected for the project, at the intersection of Sacramento and Grant Sts., as not all trucks would have to pass through that intersection after leaving the building. Traffic would be about the same at the intersection of Sacramento and Kearny Sts. as for the project. With the one-way flows of Kearny and Sacramento Sts. cars would have to pass through the Sacramento and Kearny intersection on entering and on exiting (the same as for the project). Trucks would only pass through the Sacramento/Kearny intersection on exiting the building. Trucks would enter the loading area from Kearny St. and there would be no turntable. Trucks would need to back into the loading area, which could cause temporary back-ups and delays to traffic on Kearny St. which includes the 9X San Bruno Express and 15 Third Muni lines and Sam Trans Lines. A truck turntable would enable trucks to turn around on-site. Problems would not be expected with backing out onto Kearny except on days when the turntable broke down, which could result in temporary traffic delays on Kearny St. Peak loading activity occurs between 10 a.m. and 2 p.m./4/ Therefore, peak loading activity of trucks on Kearny St. associated with this alternative, would not be expected to coincide with peak period traffic on Kearny St. which occurs during the pm commute period. Also, Muni lines run on the opposite side of Kearny St. from the site. A truck turntable could be required by the Planning Commission as a condition of project approval.

The project would not change levels of service at nearby intersections or freeway on-ramps, and this alternative would have still less impact.

Additionally, under this alternative the curb-cut would be 40 ft. wide, exceeding the allowable 30-ft. curb-cut in City Planning Code, Section 155(d). Thus, this alternative would need an exception to the Standard Requirements for Automobile Driveways (Order No. 62850) from the Director of Public Works.

Air quality, energy, and noise effects associated with on-site uses would be about the same as with the project. Cultural resource effects associated with construction of this alternative would be as for the project.

The sponsor is considering this alternative as it would meet the space needs of the Bank, and respond to concerns raised about the project.

NOTES - Alternative E2

/1/ Memorandum from Charles Bennett, Vice President, ESA, March 5, 1987. A copy of this memorandum is on file and available for review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.

/2/ Raymond E. Terwilliger, Jr., Federal Home Loan Bank of San Francisco, letter dated February 25, 1987. This letter is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.

/3/ The Proposition K analysis is on file and available for public review at the Department of City Planning, 450 McAllister St., Fourth Floor.

/4/ San Francisco Department of City Planning, 1980, Center City Circulation and Goods Movement Study.

ALTERNATIVE F: PROVISION OF REQUIRED OPEN SPACE OFF-SITE, AT ST. MARY'S SQUARE

Under this alternative, the 8,020 gsf of required open space would be provided off-site through one of two options: (A) payment for improvement of an undeveloped L-shaped area over St. Mary's Square garage including a connection to Kearny St. or (B) an in-lieu payment for the expansion of St. Mary's Square. The proposed rooftop open space would not be built under (A) or (B). The 3,100 sq. ft. galleria along California St. would be credited toward the open space requirement of 8,020 gsf for (A). For (B) it would be part of the project but not part of the open space requirement.

Under this alternative, the mechanical penthouse in the southern tower would be 16 ft.-tall compared to 22 ft.-tall with the project. All other features of this alternative would be the same as those of the project. Traffic, air quality, energy, wind, noise and employment effects of this alternative would be about the same as for the project. Shadow effects would be slightly less than those of the project, as the mechanical penthouse would be 6 ft. shorter than the mechanical penthouse for the project. Impacts on cultural resources would be the same as for the project. Option B would provide greater pedestrian access than the proposed roof top open space or Option A; both would have one elevator access.

II. PROJECT DESCRIPTION

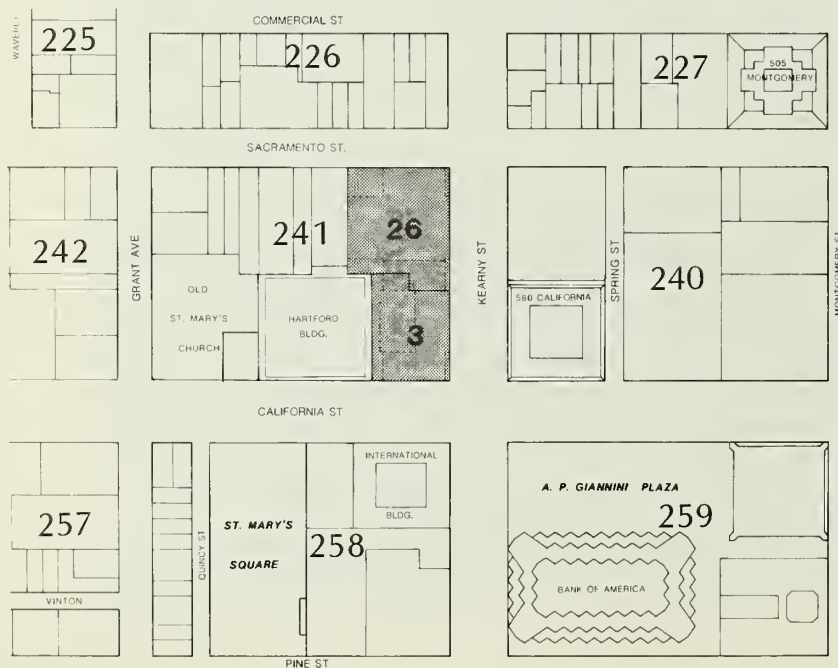
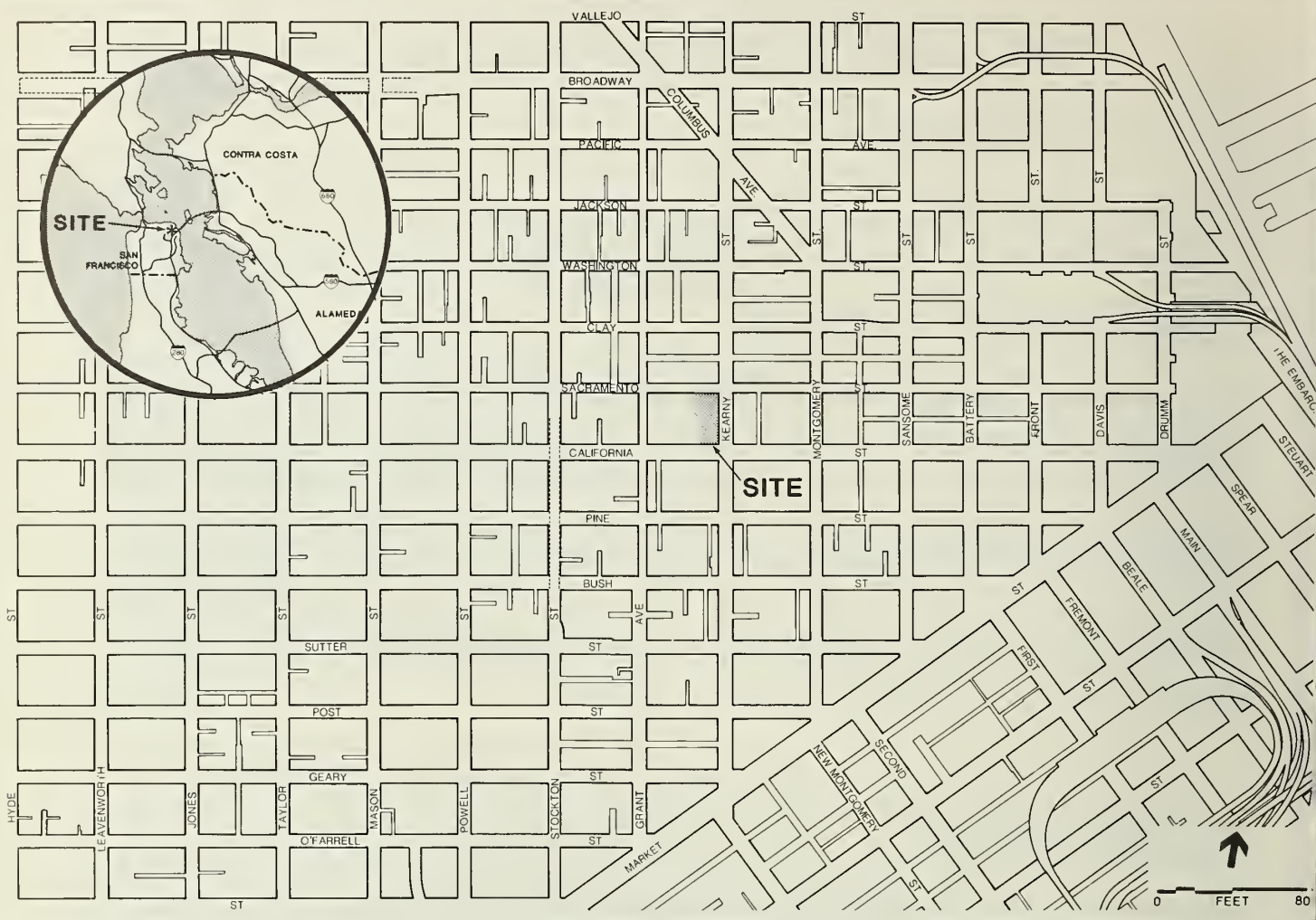
A. PROJECT SPONSOR'S OBJECTIVES

The Federal Home Loan Bank of San Francisco proposes to construct an office and retail building with three levels of subsurface parking, stepped down from 18-stories and 244-ft. at California and Kearny Sts. to nine-stories, 138 ft. at Sacramento and Kearny Sts. The Sacramento St. frontage would be stepped down from 138 ft. for two-thirds of its length to three-stories, 45 ft.-tall, along the western one-third of this frontage. The project architect is Kohn Pedersen Fox Associates of New York. The project sponsor's objectives are to develop high-quality office and retail space, provide replacement parking and alleviate existing space needs for its bank operations.


B. PROJECT LOCATION

The proposed project would be located at 600 California St., at the northwest corner of California and Kearny Sts. extending along Kearny St. to Sacramento St., in the City and County of San Francisco, on Lots 3 and 26 of Assessor's Block 241. The block is bounded by Sacramento St. on the north, California St. on the south, Kearny St. on the east and Grant Ave. on the west (see Figure 1, p. 19). The 31,822-sq.-ft. site fronts California St. on the south, Kearny St. for its entire length to Sacramento St. on the east, and

- Sacramento St. on the north. Adjacent to the western boundary of the site is the Hartford Building, and a two-story building which contains the Hartford Building's loading dock on the ground floor and office space on the second floor. The site is west of the 580 California Building, diagonally across California St. from the Bank of America headquarters, north of the International Building, all high-rises, and south of two- and three-story buildings across Sacramento St. The project would replace the nine-story (plus basement) 600 California St. office building, including ground-level parking, and a two-story parking garage (cars are currently parked on three levels: ground floor, second floor and roof).



LEGEND

 PROJECT SITE
ASSESSOR'S BLOCK 241
LOTS 3 and 26

3 LOT NUMBER

241 ASSESSOR'S BLOCK NUMBER

**600 California Street
Federal Home Loan Bank of San Francisco**

SOURCE: ESA

**FIGURE
PROJECT LOCATION**

The site is in the C-3-0 (Downtown Office) Use district. The basic Floor Area Ratio (FAR) is 9:1. The 250-S Height and Bulk District for the site allows a maximum height of 291 ft., including an optional upper tower extension of 10% of building height and a 16-foot-high mechanical penthouse. The S-bulk controls apply to four parts of a new building: base, lower tower, upper tower and upper tower extension. The general principle is reduced bulk with increased height. In the S district, the maximum length and maximum diagonal dimensions of the lower tower are 160 ft. and 190 ft., respectively. The maximum average floor size for the lower tower is 17,000 sq. ft., and the maximum floor size is 20,000 sq. ft. For the upper tower, the bulk controls are: a maximum length of 130 ft., a maximum average diagonal measure of 160 ft., a maximum average floor size of 12,000 sq. ft., and a maximum floor size of 17,000 sq. ft. Allowable exceptions to these bulk maximums are provided in Sections 270 and 272 of the Planning Code, subject to approval under Section 309.

The project would require an exception from the required 15 ft. setback from interior property lines, or center of street specified in Planning Code Section 132.1(c) Separation of Towers. Exception to the setback requirement could be permitted in accordance with the provisions of Section 309 under Section 132.1 subsection (c)2A and (c)2B. The project would require exceptions in accordance with the provisions of Section 309 under Sections 270 and 272 Bulk Limits to exceed the maximum diagonal and length dimensions, the maximum average floor area, and the volume reduction, all in the upper tower.

C. PROJECT CHARACTERISTICS

Project characteristics are summarized in Table 1. The project would be a two part structure with a higher tower (southern) portion at California and Kearny Sts. and a lower (northern) portion at Sacramento and Kearny Sts. It would step in two parts along both the Kearny St. and the Sacramento St. frontage. The proposed building would step down from about 244 ft., 18-stories at the corner of California and Kearny Sts., to 138 ft., nine stories (including a 19 ft.-tall screen which would enclose mechanical equipment) at the corner of Sacramento and Kearny Sts; three subsurface parking levels would underlie the entire building. A 22-ft., above 244 ft., mechanical penthouse would cover about 21% (of the western portion) of the southern tower, adjacent to the Hartford Building; thus the project would have a maximum height of 266 ft. From the corner of Kearny St. the

TABLE 1: PROJECT CHARACTERISTICS

<u>NUMBER OF STORIES OF NEW CONSTRUCTION</u>		<u>HEIGHT AND BULK MEASUREMENTS (ft.) AND FAR</u>		
<u>Stories</u>			<u>Allowable Under DTP Planning Code</u>	<u>Proposed Project</u>
Retail/Lobby/		Height	250 /b/	266 /b/
Truck Loading	1	Length (lower tower):	160	155
Parking (Subsurface)	3 /a/	Diagonal (lower tower):	190	170
Office	<u>17</u>	Length (upper tower):	130	155
Total Above	18	Diagonal (upper tower):	160	170
Ground Stories		Volume Reduction:	10% /c/	5%
SITE SIZE: 31,822 sq. ft.		Basic FAR of 9:1 TDR/d/ up to 18:1 FAR: 11:1/d/		
<u>PROPOSED FLOOR AREA OF NEW CONSTRUCTION</u>		<u>PROPOSED PROJECT</u>		
		<u>Area Applicable To FAR (gsf)</u>	<u>Total Gross Floor Area (gsf)</u>	
Subsurface, Parking, and Storage		39,300 /e/	90,600 /g/	
Lobby, Retail and Other				
Ground Floor Uses		0 /f/	17,400 /h/	
Offices		312,700	312,700	
Service Loading		0 /f/	10,500	
Mechanical and Storage		0 /f/	<u>21,100</u>	
TOTAL		352,000 /e/	452,300	

/a/ These three stories are subsurface parking levels and are excluded from the above grade stories.

/b/ The project site is located in a 250-S Height and Bulk District. Under Planning Code Section 263.5, additional height of up to ten percent (to 275 ft.) may be allowed, provided the volume of the upper tower extension (above 250 ft.) is reduced. In addition, a 16-ft.-high mechanical penthouse is allowed above 275 ft. in height by Section 260.b.1.(A). The project would include a 22-ft. mechanical penthouse on a portion of the southern tower; that is, it would be 266 ft. tall at its highest point and therefore would be below the maximum allowable (291 ft.).

/c/ The volume reduction applies above 160 ft.; 10% is the minimum required.

/d/ To permit the FAR on the development site to exceed 9:1, about 65,700 gsf of transferable development rights (TDR) would be transferred from as yet unidentified site(s), under Section 128 of the City Planning Code. The Floor Area Ratio (FAR) of the combined development and preservation lots would be less than, or equal to, 9:1.

/e/ Under Section 204.5(c) of the Code, parking area up to seven percent of the gross floor area of the building may be considered accessory parking (24,600 gsf in this case); parking area in excess of seven percent would not, and would be applicable to the FAR. Also, replacement short-term parking may be excluded from the FAR (allowable Section 102.8 (b) 16 pursuant to Section 309) in this case 48, spaces (14,400 gsf); therefore, total parking excluded from the FAR calculation would be 39,000 gsf (24,600 + 14,400 = 39,000 gsf).

/f/ In Section 102.8(b)1-16: exclusions from gross floor area in the C-3-O district are defined. Examples are convenience, retail and personal service and pedestrian circulation and building service space located on the ground-floor and mezzanine levels (not to exceed 75% of ground-floor interior and open space areas), and mechanical and building storage space.

/g/ With entry and exit ramps excluded, there would be 78,300 gsf of parking space.

/h/ The project would include about 7,900 gross sq. ft. of retail space on the ground floor. Other space noted would include elevator core and storage.

SOURCE: Environmental Science Associates, Inc., and Kohn Pedersen Fox Associates

Sacramento St. frontage would step down from 138-ft., nine-stories tall (for about two-thirds, or about 85 ft., of the Sacramento St. frontage) to 45 ft., three-stories tall (for about one-third, or about 45 ft., of the Sacramento St. frontage).

As calculated under the Planning Code, the building would contain about 352,000 gross sq. ft. of floor area; the gross floor area would include the office area, and that part of the proposed parking area in excess of the seven percent of the gross floor area of the building permitted as an accessory use and that part in excess of the 48 replacement short-term spaces. (Exclusion of short-term parking area in excess of seven percent of the floor area from the FAR calculation assumes that it would be replacement of short-term parking, which may be required at the discretion of the Planning Commission pursuant to Section 309. Project parking would be about 21% of the gross floor area of the building.) This would result in a Floor Area Ratio (FAR), the ratio of the gross floor area of all buildings on site (excluding retail, parking not in excess of seven percent of gross floor area, replacement short-term parking, and mechanical space, not counted as gross floor area) to site size, of about 11:1 for the 31,822-sq.-ft. development site. There would be a lobby, a galleria open to California St. (connecting to the existing Hartford Building Plaza), retail area, service loading and mechanical space on the ground floor. The project would include about 10,400 gross sq. ft. of open space, 7,300 sq. ft. contained on a rooftop terrace and 3,100 sq. ft. in the galleria of the 18-story (southern) portion of the building along California St. Three subsurface parking levels would contain about 232 independently accessible parking spaces (48 short-term, 82 long-term and 102 yet to be determined as long- and/or short-term) and entry and exit ramps. Access to three at-grade truck loading docks and the three subsurface parking levels would be on Sacramento St. The loading area would include a truck turntable within the building which would allow trucks to completely turn around off street and exit onto Sacramento St. Cars would exit the three subsurface parking levels onto Kearny St. Pedestrian access to the building would be from California and Kearny Sts.

Floors two through eighteen at California and Kearny Sts. would be office (including some mechanical space), with a mechanical penthouse above; floors two through nine at Sacramento and Kearny Sts. would contain office and some mechanical space with a

- 19-ft. wall above screening mechanical equipment.

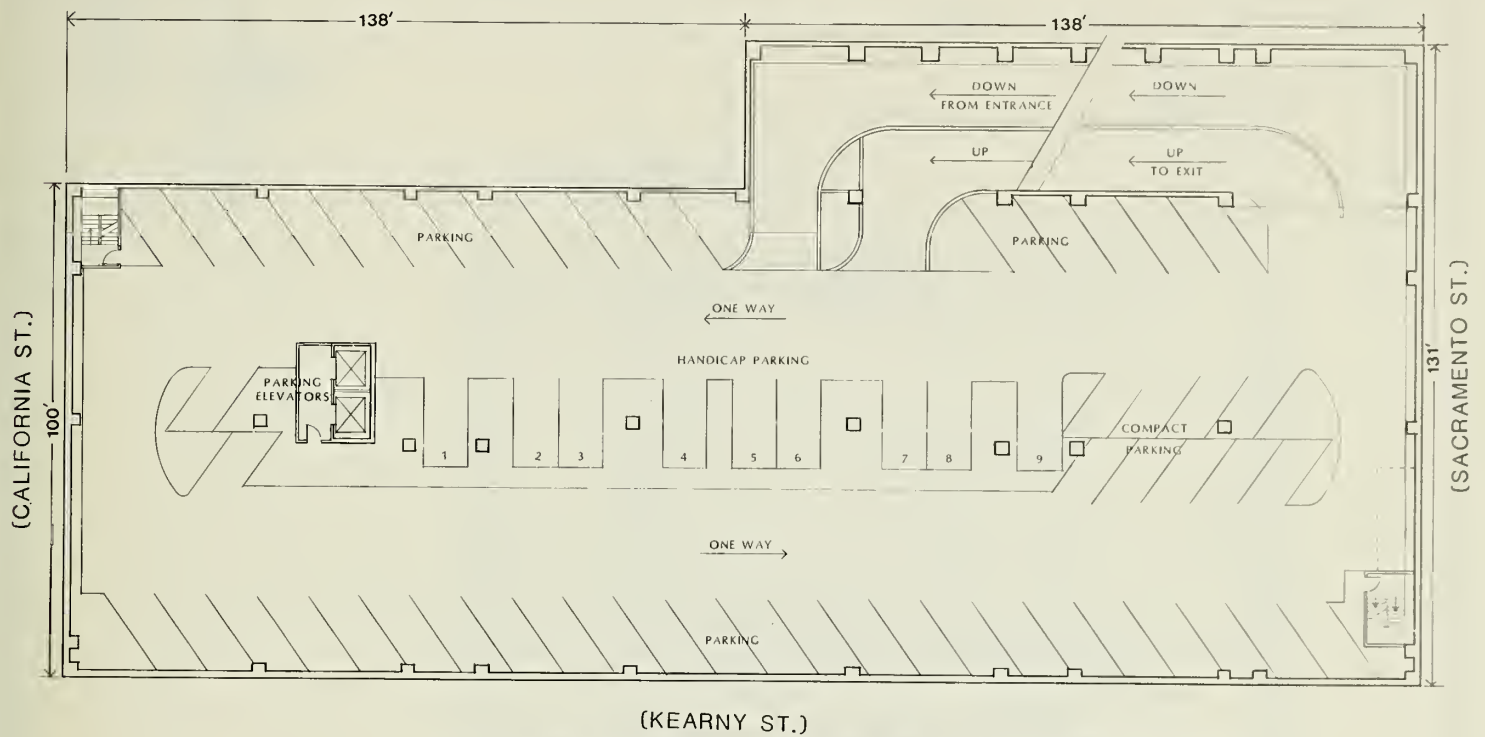
The base, as defined by the Downtown Plan, is the height equal to 1.25 times the width of the widest abutting street (California St.) or about 106 ft. for the project (height above grade as measured from the center of the project frontage along California St.). The base would include floors one through nine (for both north and south towers). The lower tower would be floors ten to 13 which would contain an average floor size of about 13,190 sq. ft. (south tower). The upper tower would begin at the 14th floor (south tower). The average floor size in the upper tower (south tower) would be about 12,740 sq. ft. The project would include a five percent reduction of volume in the upper tower (south tower).

Floor plans and elevations are shown in Figures 2 to 8, pp. 24 to 30.

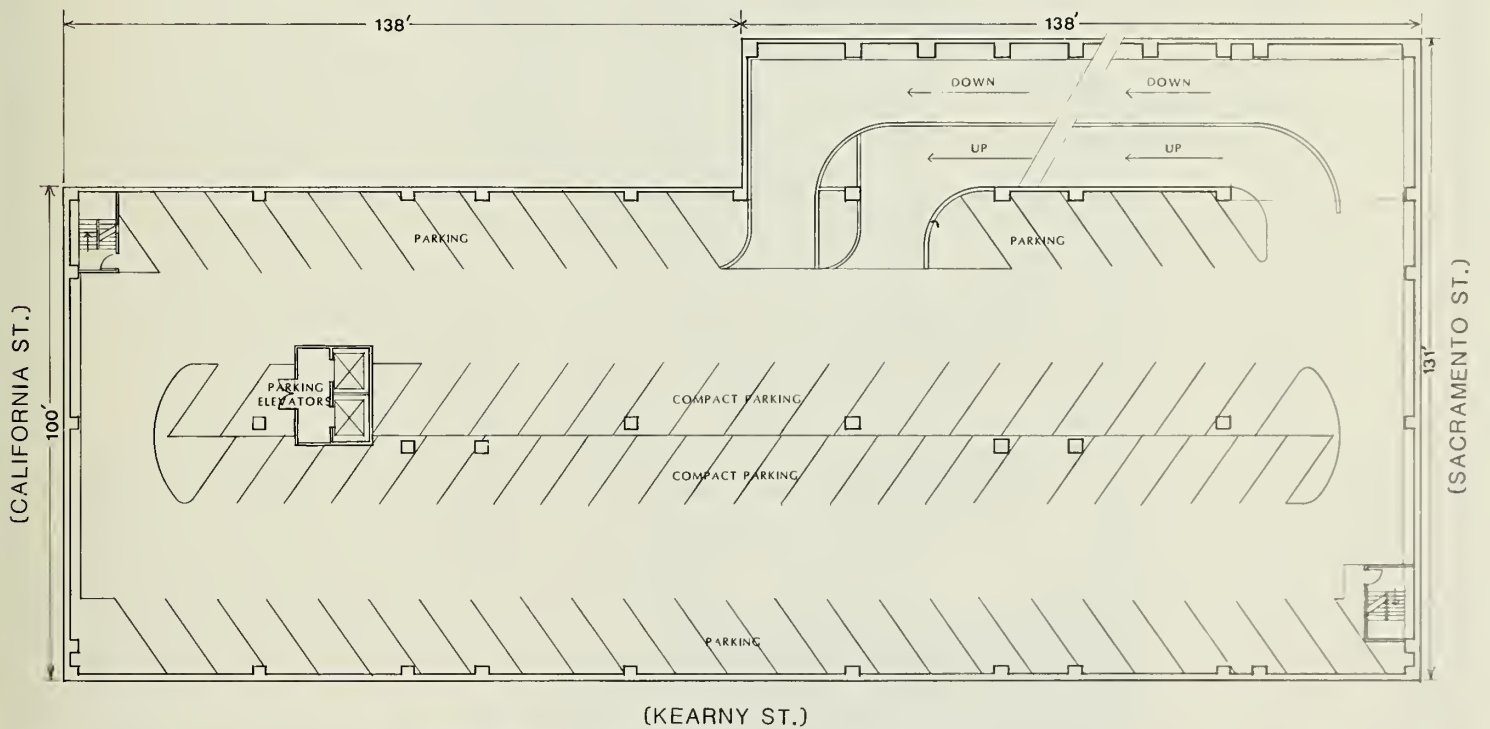
The building would include about 312,700 gross sq. ft. of office space, 7,900 gross sq. ft. of retail space, 21,100 gross sq. ft. of mechanical and storage space, 10,400 gross sq. ft. of open space, and about 90,600 gross sq. ft. of parking space (232 spaces and entry and exit ramps), and three truck loading docks. Total net changes in floor area for the site would be a net increase of about 216,100 sq. ft. of office (the 600 California St. building, and the Hertz rent-a-car office, both to be demolished contain, about 96,600 sq. ft. of office space. Thus $312,700 - 96,600 = 216,100$ gsf, a net increase of 7,900 sq. ft. of retail and a net increase of about 22,200 sq. ft. of parking area ($90,600 - 68,400 = 22,200$), with a net decrease of 37 parking spaces. (The increase in parking area but decrease in the number of spaces is due to the change from valet to independently accessible spaces and the inherent inefficiency of newer high-rise buildings, such as the project, with large building cores and increased ramp and maneuvering space as compared with the existing parking structure at 551 Kearny.)

The project would use about 65,700 gross sq. ft. of transferred development rights (TDR). The project sponsor has not yet identified a building or buildings from which development rights would be sought. The overall FAR for the development and preservation lots would be 9:1, or less.

The project would incorporate art as required by the Downtown Plan and Planning Code; provide a total of 10,400 sq. ft. of required open space on site in the form of a rooftop terrace (7,300 sq. ft.), with benches and landscaping, on the 18-story portion of the building and (3,100 sq. ft.) in a galleria along California St.; and meet the childcare requirement in a manner to be determined.



FIRST BASEMENT LEVEL PLAN (HIGHEST LEVEL)



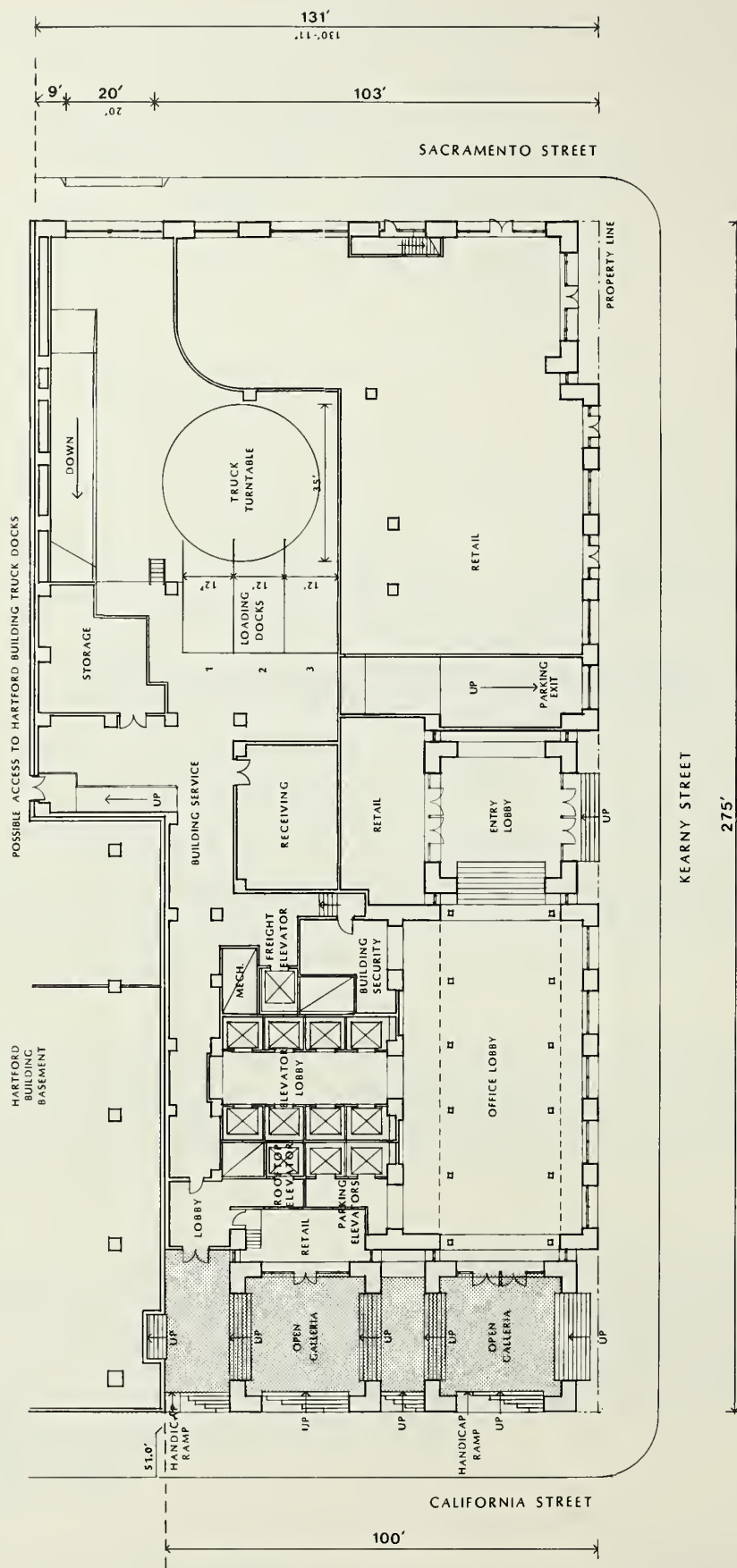
SECOND AND THIRD BASEMENT LEVEL PLAN



**600 California Street
Federal Home Loan Bank of San Francisco**

**FIGURE 2
FIRST, SECOND AND THIRD
BASEMENT LEVEL PLANS**

SOURCE: Kohn Pedersen Fox Associates



□ OPEN SPACE



• FIGURE 3
GROUND FLOOR PLAN

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates

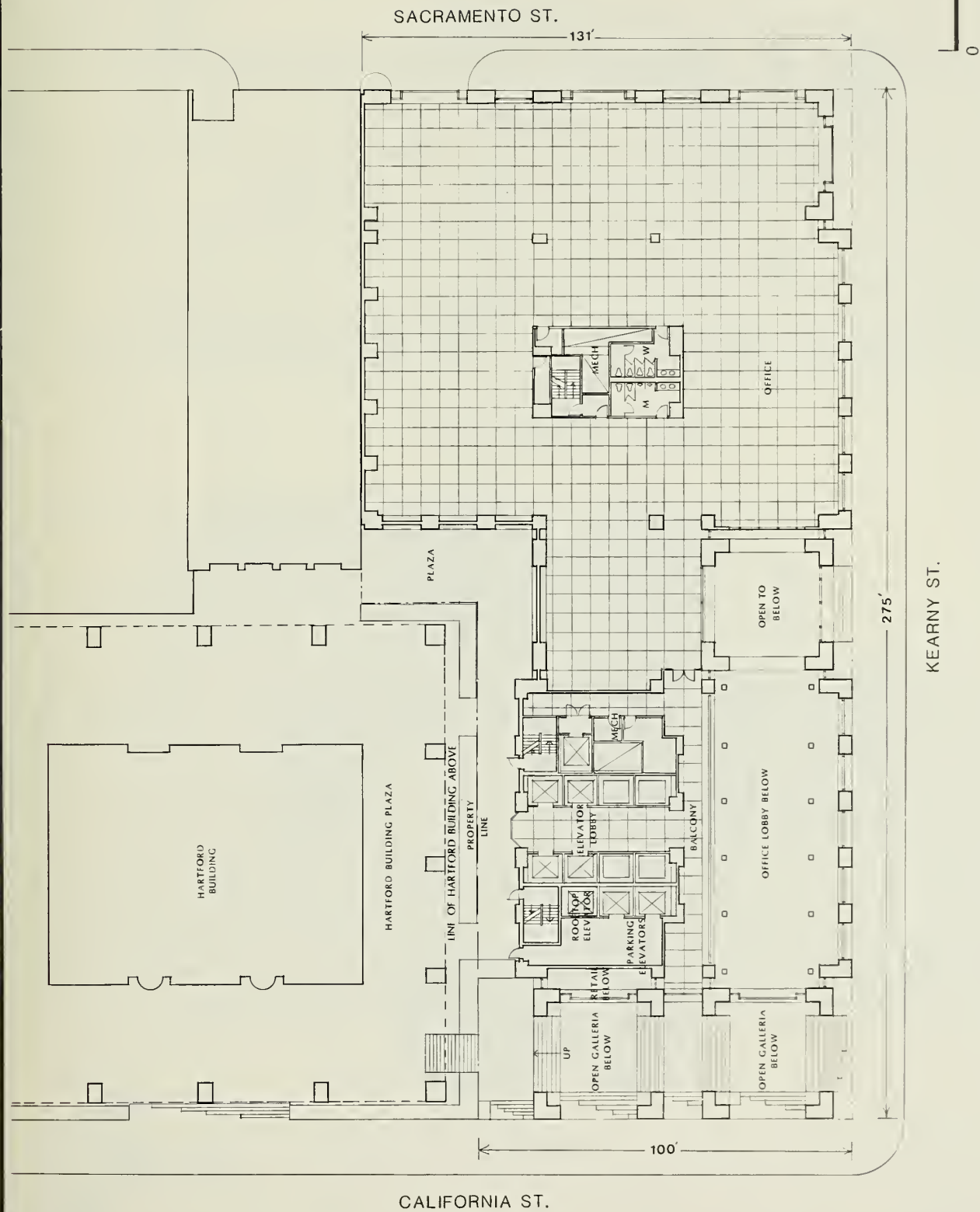
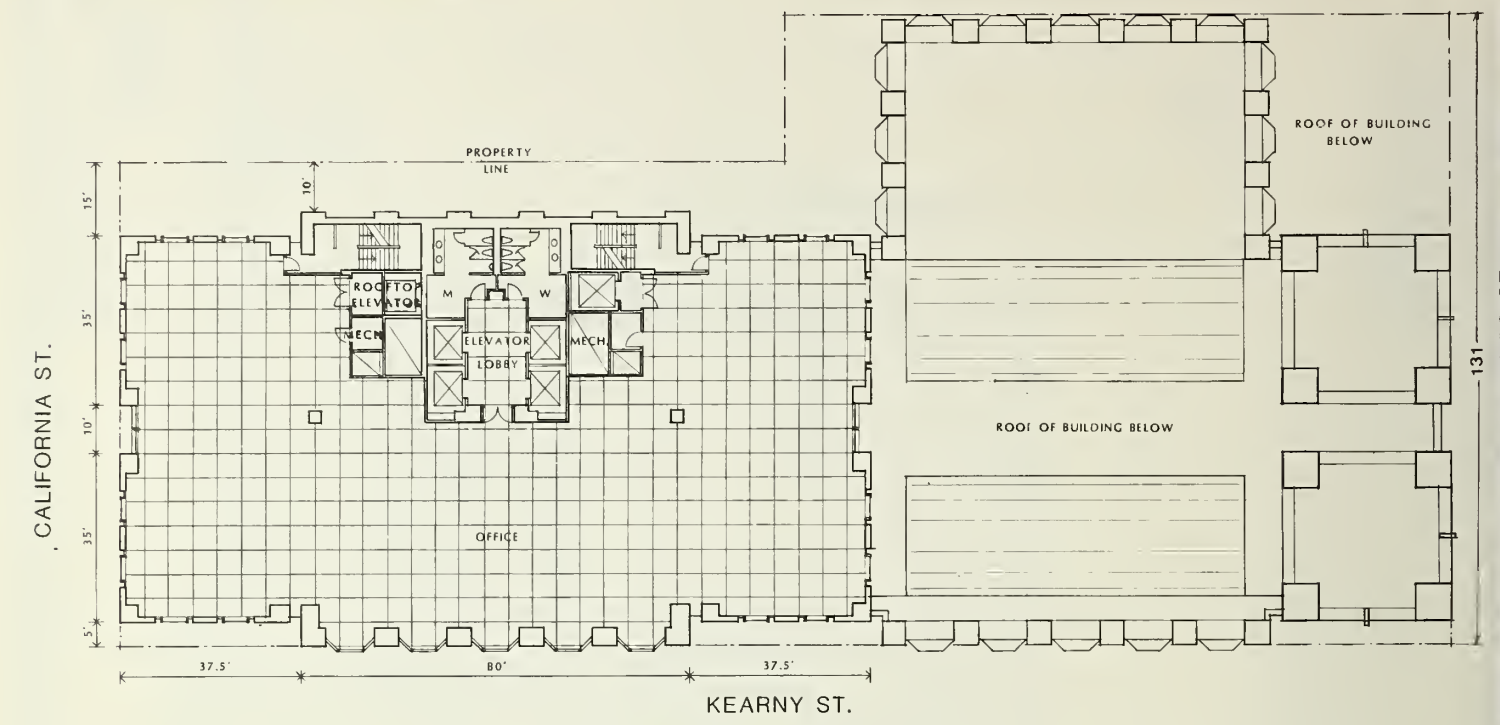


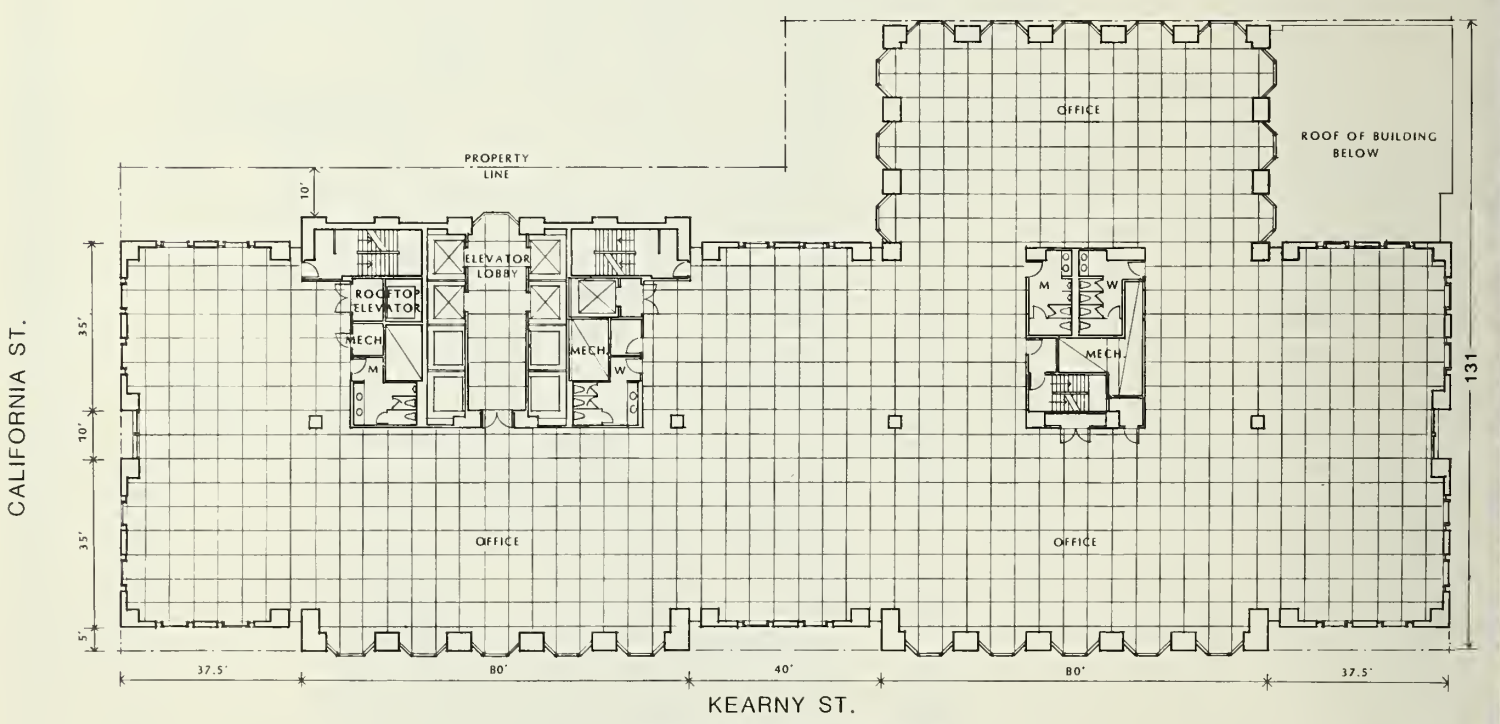
FIGURE 4
SECOND FLOOR PLAN

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates



TYPICAL FLOORS 10-18



TYPICAL FLOORS 3-9



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates

FIGURE 5
TYPICAL LOWER AND UPPER
OFFICE FLOOR PLANS

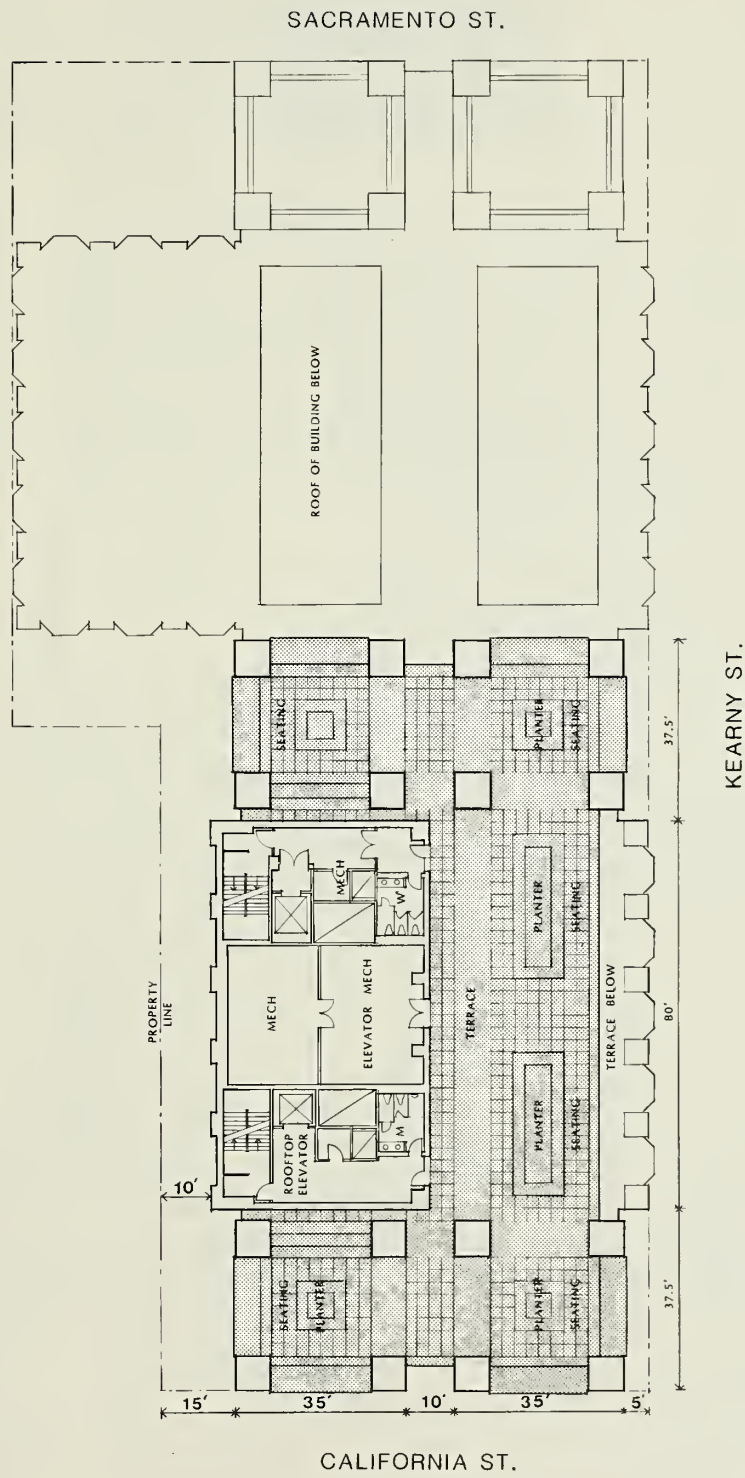
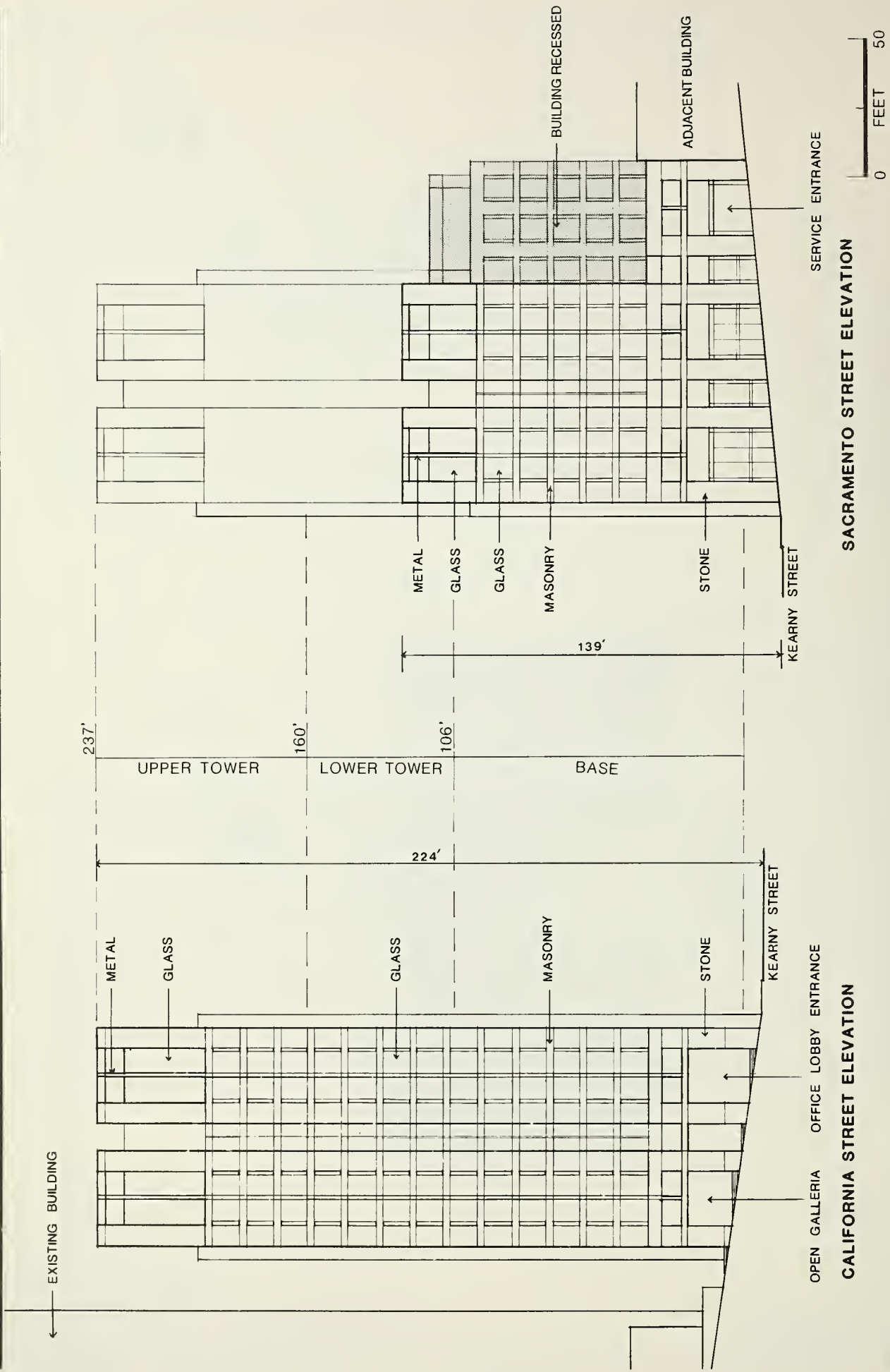


FIGURE 6
ROOFTOP TERRACE PLAN

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates



600 California Street
 Federal Home Loan Bank of San Francisco
 SOURCE: Kohn Pedersen Fox Associates

FIGURE 7
 CALIFORNIA STREET AND
 SACRAMENTO STREET ELEVATIONS

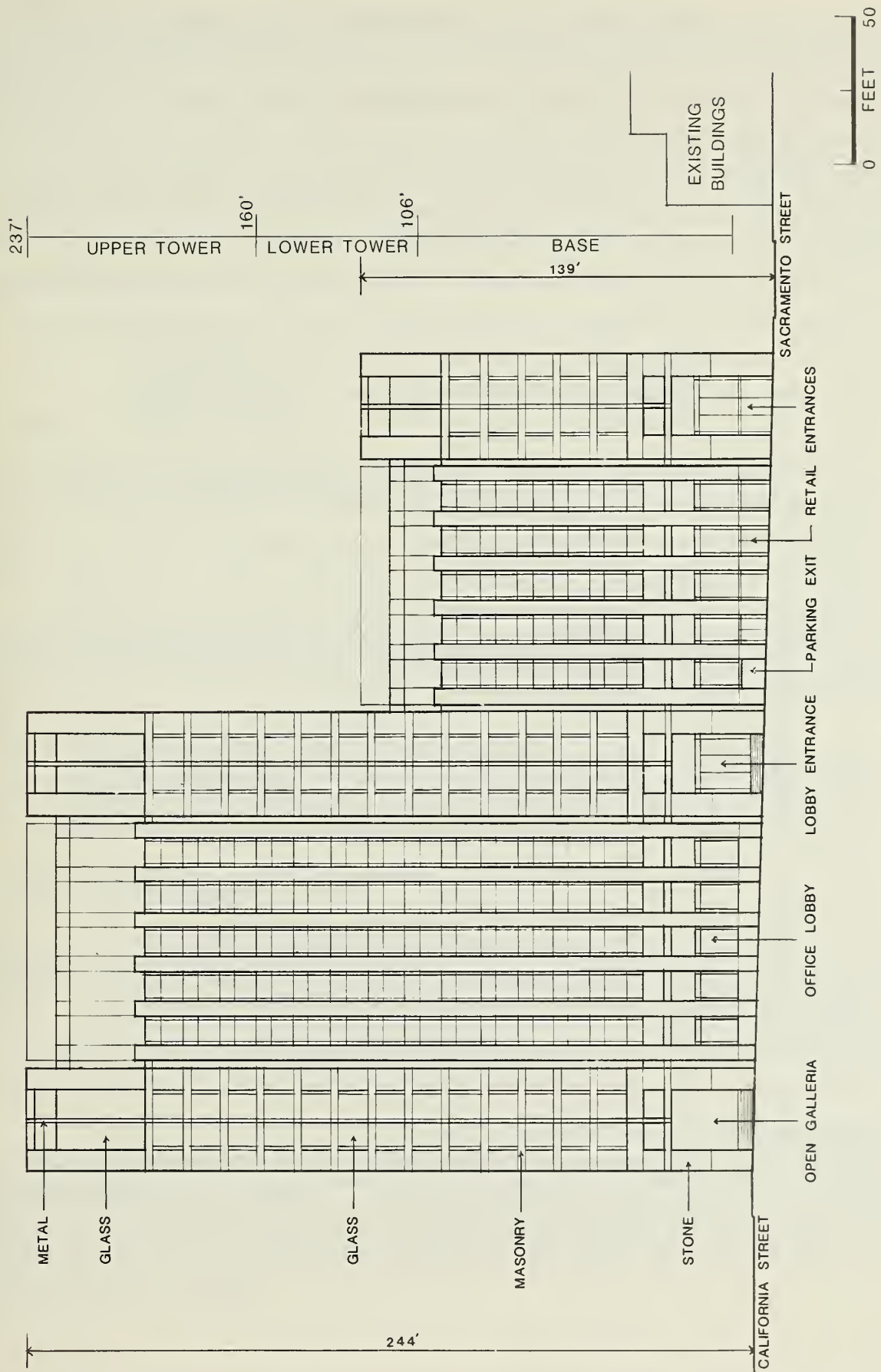


FIGURE 8
KEARNY STREET ELEVATION

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates

The project would be built to the property lines to a height of about 138 ft. on the northeastern portion of the building, (Kearny and Sacramento Sts.) to a height of 45 ft. on the northwestern corner of the building (on Sacramento St.) and to a height of 244 ft. on the southern portion of the building (California and Kearny Sts.). The southern portion of the building, would be set back ten ft. from the interior property line (where the mechanical core would be located) on the west, and by about 15 ft. from the rest of this interior property line adjacent to the Hartford Building; the northern portion of the building would be built to the (western) interior property line (see p. 67, in the Zoning section, which describes exceptions to the Separation of Towers setback requirement). The northern tower would be 138 ft.-tall for 85 ft. (or about two-thirds) and 45 ft.-tall for 45 ft. (or about one-third) of the Sacramento St. site frontage, and would be 138 ft.-tall extending south on Kearny to about 118 ft. from Sacramento St. The south tower of the building would be 244 ft.-tall at the corner of California and Kearny Sts. along the 100 ft. California frontage and extending about 157 ft. north, toward Sacramento St. The project, including both towers, would occupy the full 275 ft. frontage of Kearny between California and Sacramento Sts. Above about 138 ft., the southern tower would continue without setback to a height of 244 ft. A mechanical penthouse would occupy about 21% of the south tower roof adjacent to the Hartford Building for a maximum building height of 266 ft.

Both towers would have a three-part vertical composition; the architectural base (ground-floor, second and third floors); a middle shaft (floors four through 15 in the southern tower and floors four through six in the northern tower); and a top (levels 16 through 18 and a mechanical penthouse on the southern tower and levels seven through nine in the northern tower and a screen enclosing mechanical equipment). The three-story architectural base element would have one double-height rectangular opening along Kearny St., and three along California St. to provide pedestrian access to the double height galleria along California St. Between the openings would be single-height entrances at ground-level to the office lobby and retail areas, with recessed windows above the entrances extending up to the second and third floors. The architectural base element would be defined by a projecting cornice line on the California, Kearny and Sacramento St. faces. Bay windows and projecting piers clad in light-colored masonry would extend vertically between the base cornice line, extending the full building height, intended to complement the facades of larger, older development in the Financial district.

D. PROJECT SCHEDULE, COST AND APPROVAL REQUIREMENTS

SCHEDULE

The project sponsor expects environmental review, project review and detailed design to be completed in early to mid 1987. If the project were approved and building permits issued, demolition and construction would take about 24 months. Construction periods are projected as follows:/1/

Demolition/Excavation/Shoring	32 weeks
Foundations	4 weeks
Steel Erection	12 weeks
Exterior Finishing	48 weeks

Initial occupancy would occur about 24 months from the start of demolition.

COST

Estimated construction cost of the project would be about \$48 million, including demolition, excavation, building shell and interior improvements. Replacement cost for the entire building, including architectural and engineering fees, and tenant improvements, would be about \$65 million. Office space is expected to rent for approximately \$25 to \$35 per sq. ft. per year. Retail space is expected to rent for approximately \$40 to \$50 per sq. ft. per year. (All figures are in 1986 dollars)/2/.

APPROVAL REQUIREMENTS

Following a public hearing before the City Planning Commission on the Draft EIR, responses to written and oral comments will be prepared. The EIR will be revised as appropriate and presented to the City Planning Commission for certification. No permits may be issued before the Final EIR is certified.

The Downtown Plan was adopted and proposed amendments to the City Planning Code to implement it (Permanent Controls) were approved by the City Planning Commission on November 29, 1984 (Resolution No. 10165). The proposed amendments were acted on by the Board of Supervisors and signed by the Mayor, in September 1985, and became effective October 17, 1985.

- The Office Growth Limitation Ordinance (Ordinance No. 414-85 approved September 10, 1985 by the Board of Supervisors, signed by the Mayor September 17, 1985, and effective
- October 17, 1985) limited growth in the form of major office developments (over 50,000 sq. ft.) in San Francisco to a total of 2.85 million sq. ft. over a period of three years (an average of 950,000 sq. ft. per year). This includes development citywide and encompasses development by the Redevelopment Agency, the Port of San Francisco, and State and Federal agencies. In accord with the ordinance, the project would be subject to review and approval under Planning Code Section 321, Office Development: Limits. About 312,700 sq. ft., the amount of office space in the proposed building, would count against the total allowable under the Ordinance.
 - On November 14, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative. It amends Section 320(g)(1) of the City Planning Code to lower the threshold for office projects subject to the annual limit from 50,000 gsf to 25,000 gsf of additional office space. Since the proposed project would add office space in excess of 25,000 gsf, it is now subject to the provisions of Sections 320 - 325 as amended by Proposition M. Proposition M also adds Section 321.1 to the Planning Code, and reduces the approval period from three years to one year; and changes the limitation amount from 2.85 million sq. ft. of office space over three years to 950,000 gsf in each one-year period. Section 321.1 requires the adjustment of the 950,000 square foot annual limit by limiting new office space approvals to 475,000 sq. ft. annually until the total amount of space approved since November 29, 1984, is reduced to zero in annual increments of 475,000 sq. ft. Up to 950,000 gsf may be approved during the approval period ending October 1987 because no projects were approved under the Office Limitation Program during the first year period ending October 17, 1986.
 - Proposition M also establishes eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the

- Priority policies. The City Planning Commission, in its decision regarding the proposed project approval or disapproval would make a determination of the project's conformance with the Priority Policies.

Under Planning Code Section 309, Permit Review in the C-3 Districts, the project would require exceptions to separation of towers requirements (allowable under Section 132.1(c)2A and (c)2B), bulk limits (allowable under Section 272(a) 1,3,4 and 5), and to exceed the pedestrian wind comfort criteria at one location on California St. (allowable under Section 148(a)).

- The project would require an exception, in accordance with the provisions of Section 309, to increase winds above the 11 mph pedestrian criterion at one location and to continue existing exceedences of the pedestrian and seating criterion at twelve locations, allowable under Section 148(a).

There are currently 221 long-term and 48 short-term spaces on site or 269 spaces. A total of 232 spaces are proposed. The project would require Conditional Use authorization (City Planning Code Section 204.5(c)) for parking in excess of the seven percent of the gross floor area of the building permitted as an accessory use and in excess of the proposed replacement short-term spaces allowable under City Planning Code Section 102.8(b) 16 (about 39,000 gsf could be permitted as an accessory use and replacement short-term parking; 78,300 gsf is proposed, excluding ramps. The exclusion of the 48 proposed replacement short-term spaces (about 14,400 gsf) and the allowable seven percent (82 spaces proposed as long-term spaces) of the gross floor area (about 24,600 gsf) would result in an excess of 39,300 gsf, or 102 parking spaces, which would be subject to Conditional Use authorization by the City Planning Commission, which would also determine the number of spaces which would be long- and/or short-term. (The proposed 48 replacement short-term spaces would be part of the Conditional Use application if not approved by the Planning Commission. The project would not conform to Section 155(g)

which requires that parking spaces in the C-3 district shall maintain a rate structure that encourages short-term use and discourages all-day parking. No exception is allowable under Section 309. The project sponsor has requested an opinion from the Zoning Administrator as to whether a long-term rate structure could be allowed (for the proposed long-term spaces) under the Variance process.

The City Planning Commission would hold a public hearing to consider the project application under Sections 309 and 321, including requests for exceptions under Section 309(e) and would adopt a motion approving, approving with conditions, or disapproving the project.^{/3/} If the project were approved by the City Planning Commission, the project sponsor must obtain demolition, building, and related permits from the Central Permit Bureau of the Department of Public Works. An application for a Site Permit for the project has not yet been filed.

NOTES - Project Description

- /1/ Mike Ford, Swinerton & Walberg Co., letter, May 7, 1986, on file at the Department of City Planning, 450 McAllister St., San Francisco, Ca.
- /2/ Ray Terwilliger, Federal Home Loan Bank of San Francisco, letter, September 15, 1986, on file with the Department of City Planning, 450 McAllister St., San Francisco, Ca.
- /3/ The Planning Code (Section 309(h)) requires a public hearing before the City Planning Commission for all office and hotel projects exceeding 50,000 sq. ft. of net new area.

III. ENVIRONMENTAL SETTING

A. LAND USE AND ZONING

LAND USE

The project site extends along the west side of Kearny St. from its intersection with California St. to Sacramento St. The 34-story Hartford Building, fronting on California St., and a two-story office building fronting on Sacramento St., abut the site on the west. Directly east of the site, across Kearny St., is the 580 California St. office building, completed in 1983; and the 550 Kearny St. office building. Diagonally across Kearny and California Sts. from the site is the 52-story Bank of America Headquarters Building; directly south of the site, across California St., is the 22-story International Building. Directly north of the site, across Sacramento St., are four, two-to three-story buildings, which generally contain ground-floor retail uses with office space above.

The project area is characterized by a mix of low- and high-rise commercial buildings, generally to the south, west, and east; and low- and mid-rise buildings including commercial, institutional and residential buildings to the north and northwest.

The project site is in an area where high-rise office buildings of the Financial District meet low-rise commercial and residential buildings of Chinatown. Land use to the south, east and west in the site vicinity consists predominantly of high-rise office buildings, many of which are related to banking, finance and commerce with some ground-level retail uses interspersed with some lower buildings. Land use to the north and northwest consists primarily of low- and mid-rise commercial buildings characteristic of Chinatown, which is north and west of the site.

As noted, neighboring buildings to the south, east and west are newer high-rise high intensity office buildings in the financial district, including the Bank of America Building, the recently completed 580 California St. Building, the Hartford Building and the International Building. There are four low-rise buildings (three-stories) located north of

the site across Sacramento St. The buildings south, and east in the immediate site vicinity range in height from about 325 ft. (International Building) to 780 ft. (Bank of America). Most of the buildings north and west of the site are low- to mid-rise and range in heights from about 35 to 45 ft. Buildings under construction, or recently constructed, in the project area include the 325 ft., 505 Montgomery building, under construction one block northeast of the project site; one block east of the project block, the 378 ft.-tall, 456 Montgomery St. building is nearing completion; east on that same block, is the location of the proposed 343 Sansome St. building, which is under formal environmental review by the Department of City Planning. The 456 Montgomery St. building incorporates the facades of two 1908 low-rise buildings into a tower. The 343 Sansome St. development would incorporate two facades of an existing 1930 mid-rise building into a new tower.

The site is occupied by two buildings: a nine-story office building, 600 California St., and a two-story, three-level parking garage, 551 Kearny St. (see Figures 9-12, pp. 37 to 40). Both structures on the site are built to lot lines. Uses on the site include a total of about 96,600 sq. ft. of office space, 95,800 occupied by the Federal Home Loan Bank of San Francisco with 29 ground floor parking spaces, about 240 parking spaces in the garage, and a 800 sq. ft. rent-a-car office, 533 Kearny St. Businesses at the site employ about 373 persons.

Uses on the project block are mixed. West of the site is the Hartford Building, containing office uses. West of the Hartford Building, at the corner of California St. and Grant Ave. in Chinatown, is St. Mary's Church and adjacent to the Church, toward the site, is St. Mary's Parish House. North of St. Mary's, along the east side of Grant Ave. and along the south side of Sacramento St., east side of Grant Ave., are several two-to-four story buildings containing retail uses on the ground floor, generally with residential uses above. The two-story Nam Kue School, is located at 755 Sacramento St. one-half block east of the site. Office uses and ground floor retail uses generally occupy buildings in the area south and east of the site. Uses along both sides of California St., from the Hartford Building adjacent to the site, east as far as the intersection of Sansome St. with California St., are generally high-density office uses with banking uses often occurring on the ground floors (see Figure 13, p. 42).

Ground floor retail uses generally occupy buildings on blocks north and west of the site in Chinatown. Uses along Clay, Sacramento and Commercial Sts., on blocks north of the

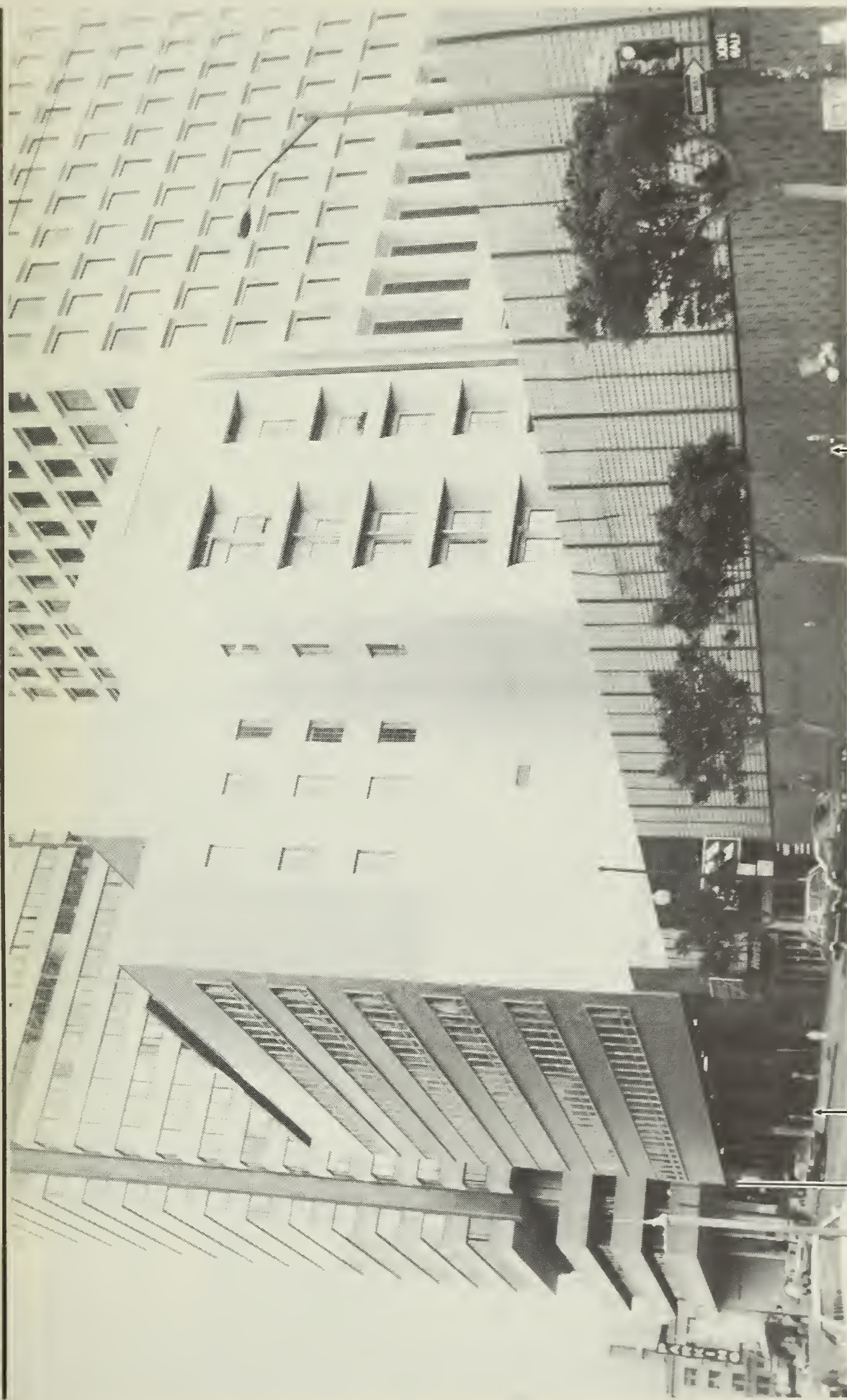


FIGURE 9
VIEW OF SITE
SOUTHWEST FROM KEARNY ST.

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA



SITE

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 10
VIEW OF SITE NORTHWEST FROM
CALIFORNIA/KEARNY INTERSECTION
(A.P. GIANNINI PLAZA)

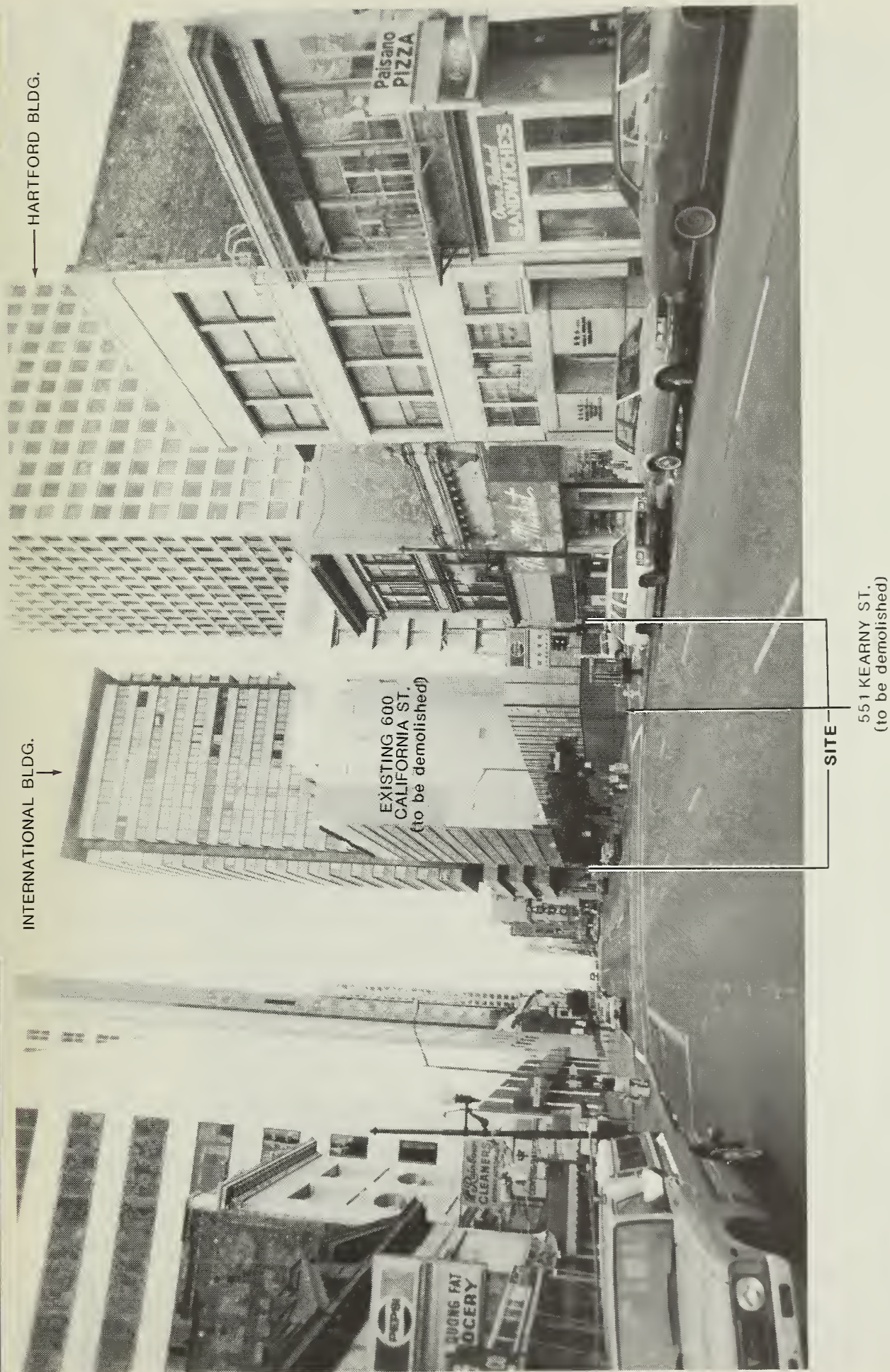
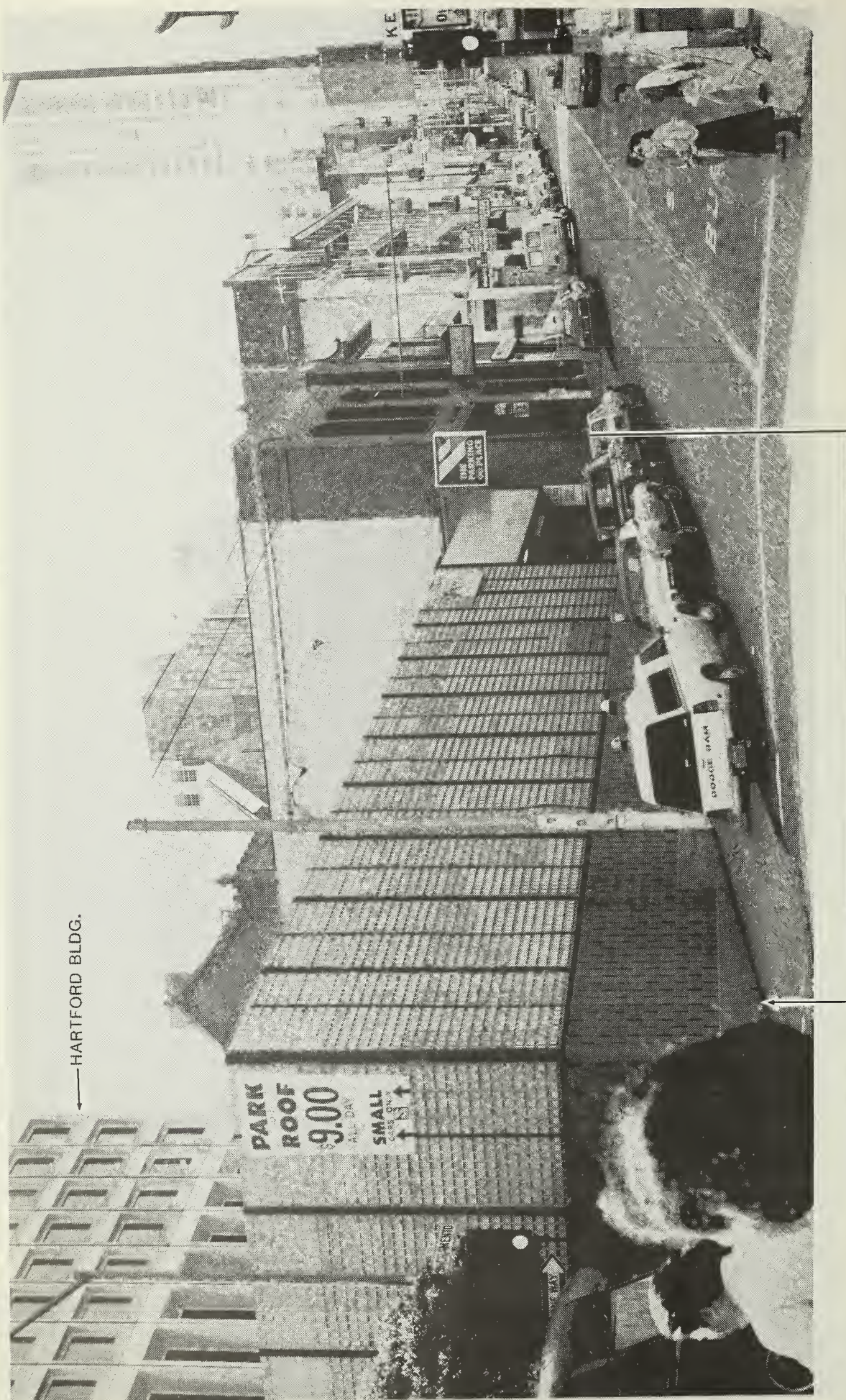


FIGURE 11
VIEW OF SITE
SOUTH FROM KEARNY ST.

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA



— SITE —
551 KEARNY ST.
(to be demolished)

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 12
VIEW OF SITE WEST FROM
SACRAMENTO STREET AT KEARNY STREET

site, include small-scale retail businesses such as restaurants, grocery stores and small retail shops. Along Grant Ave. and Stockton St., between Pine and Clay Sts., retail businesses are generally specialty stores catering to tourists and retail food stores serving residents of Chinatown. Grant Ave. and Stockton St. are the main north-south retail/commercial streets in Chinatown. Generally in Chinatown, second floor uses are either residential, as along Commercial St. and Waverly Pl. one block north and one block northwest, respectively, of the site, and as along the eastern side of Stockton St. between California and Clay Sts., about one and one-half block west of the site; or small business offices such as travel agencies, doctors' and dentists' offices, and headquarters offices for clubs and organizations catering to residents of Chinatown, such as those along Grant Ave., and Kearny, Clay, and Sacramento Sts.

The nearest open space in the site vicinity is A.P. Giannini Plaza, part of the Bank of America headquarters building, located diagonally across California St. from the project site. St. Mary's Square is southwest of the site in the block bounded by Kearny and Grant, through the block between California and Pine Sts. Portsmouth Square is two blocks north of the site between Kearny St. and Brenham and Washington and Clay Sts. The Chinese Playground is located about one block west of the site on Sacramento St. between Stockton and Grant Sts.

ZONING

The project site is within the area of the Downtown Plan, regulated by implementing sections of the Planning Code. (The EIR prepared for the Downtown Plan was certified on October 18, 1984. The Downtown Plan and related amendments to the San Francisco Master Plan were approved and adopted by the City Planning Commission on November 29, 1984. The Board of Supervisors approved the Downtown Plan and implementing ordinances on September 10, 1985. The ordinances were signed by the Mayor on September 17, 1985, and took effect October 17, 1985.)

As noted on p. 33, the Office Growth Limitation Ordinance limits growth of major office development (over 50,000 sq. ft.) to a total of 2.85 million sq. ft. over a three-year period (an average of 950,000 sq. ft. per year). This includes development citywide and encompasses development by the Redevelopment Agency, the Port of San Francisco and State and Federal agencies. Section 321 of the Planning Code implements this ordinance.

On November 14, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative. It amends Section 320(g)(1) of the City Planning Code to lower the threshold for office projects subject to the annual limit from 50,000 gsf to 25,000 gsf of additional office space. Since the proposed project would add office space in excess of 25,000 gsf, it is now subject to the provisions of Sections 320 – 325 as amended by Proposition M. Proposition M also adds Section 321.1 to the Planning Code, and reduces the approval period from three years to one year; and changes the limitation amount from 2.85 million sq. ft. of office space over three years to 950,000 gsf in each one-year period. Section 321.1 requires the adjustment of the 950,000 square foot annual limit by limiting new office space approvals to 475,000 sq. ft. annually until the total amount of space approved since November 29, 1984, is reduced to zero in annual increments of 475,000 sq. ft. Up to 950,000 gsf may be approved during the approval period ending October 1987 because no projects were approved under the Office Limitation Program during the first year period ending October 17, 1986.

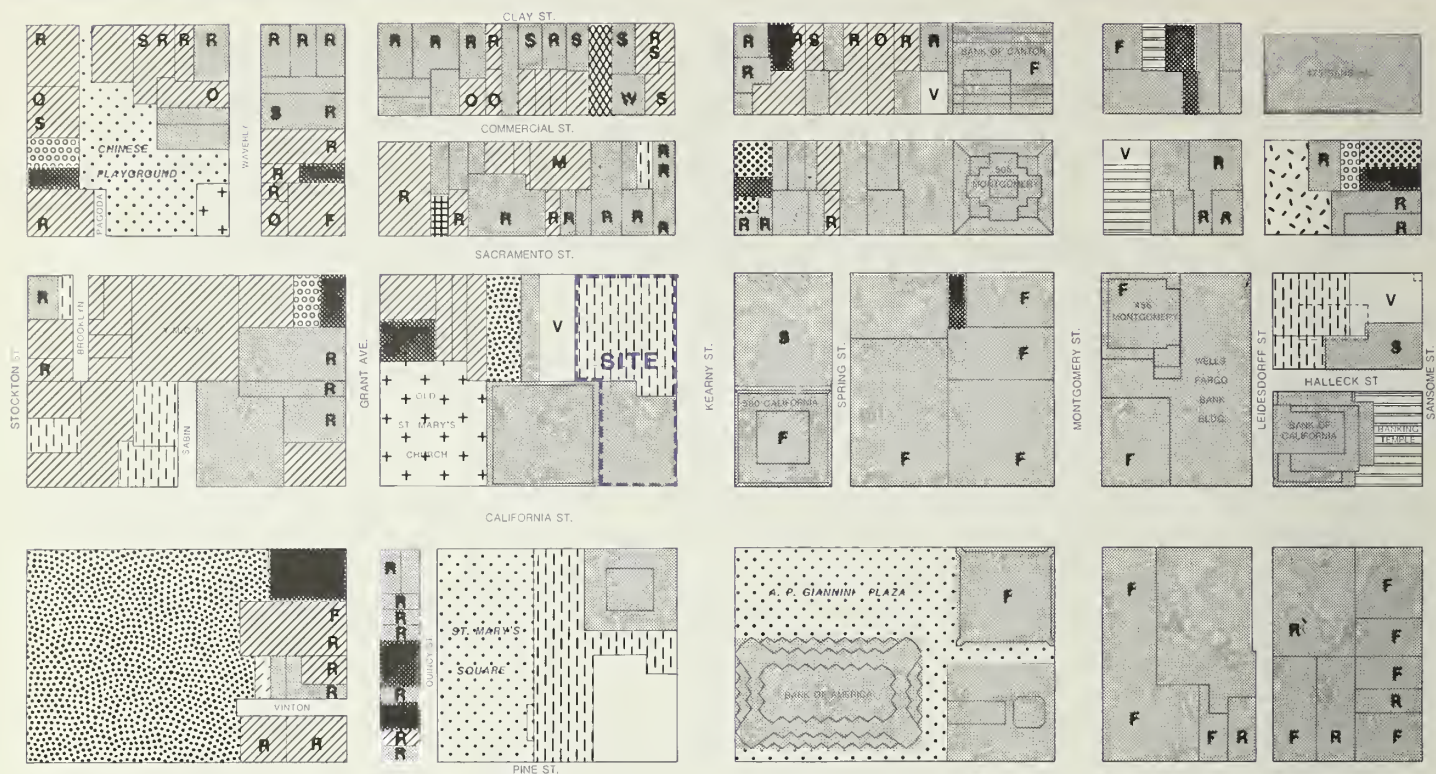
Proposition M also establishes eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority policies. The City Planning Commission, in its decision regarding the proposed project approval or disapproval would make a determination of the project's conformance with the Priority Policies.

The site is in the C-3-O (Downtown Office) use district (see Figure 14, p. 44). Office and retail are primary permitted uses in this zoning district. Development is allowable with a basic Floor Area Ratio (FAR) of 9:1. Development greater than the basic 9:1 FAR, up to a maximum 18:1 FAR, is allowable through transfer of development rights (TDR) from sites, in the same zoning district, that include architecturally significant buildings with unused potential floor area. All unused area applicable to the FAR of the preservation site may be transferred to a development lot in the same C-3 zoning district, subject to setback, sunlight access, separation between towers and any other limitations pursuant to Planning Code Section 309, Permit Review in the C-3 Districts.

The site is in a 250-S Height and Bulk district, in which the maximum allowable height is 250 ft. (see Figure 14, p. 44). Ten percent of permitted building height may be allowed above the height limit, pursuant to the provisions of Section 309, upon further reduction in the volume of the upper portion of the tower (that is, up to 275 ft.). An additional height of up to 16 ft. is allowable for a mechanical penthouse. Thus, in the 250-S District, the maximum allowable height is 291 ft. In the S Bulk District, the maximum length and maximum diagonal dimensions of the lower tower are 160 ft. and 190 ft., respectively. The maximum average floor size is 17,000 sq. ft.; the maximum floor size is 20,000 sq. ft. For the upper tower the bulk controls are: a maximum length of 130 ft.; a maximum diagonal dimension of 160 ft.; a maximum average floor size of 12,000 sq. ft.; and a maximum floor size of 17,000 sq. ft. Allowable exceptions to these bulk maximums are provided for in Section 270 and 272, subject to approval under Section 309.

Off-street parking is not required for commercial uses in the C-3-O district, and long-term parking is discouraged. According to Section 204.5(c) of the Planning Code, up to seven percent of the gross floor area of a building may be devoted to parking as an accessory use when no parking is required. This area is not counted as part of the FAR. In C-3 districts, off-street loading and service vehicle spaces are required as follows: 0.1 spaces per 10,000 sq. ft. of office (to closest whole number); no spaces are required for less than 10,000 gross sq. ft. of retail (Planning Code, Section 152.5, Table 5.5).

Open space is required for commercial uses in the C-3-O District in a 1:50 ratio of open space to uses with open space requirements, as per Section 138(a) and (b) of the Planning Code; and contribution of \$2.00 for each net new gross sq. ft. of office to the Downtown Park Fund (Section 139(d)). The open space provided must meet minimum standards as defined by Section 138(d) of the Code.



LEGEND

GROUND FLOOR

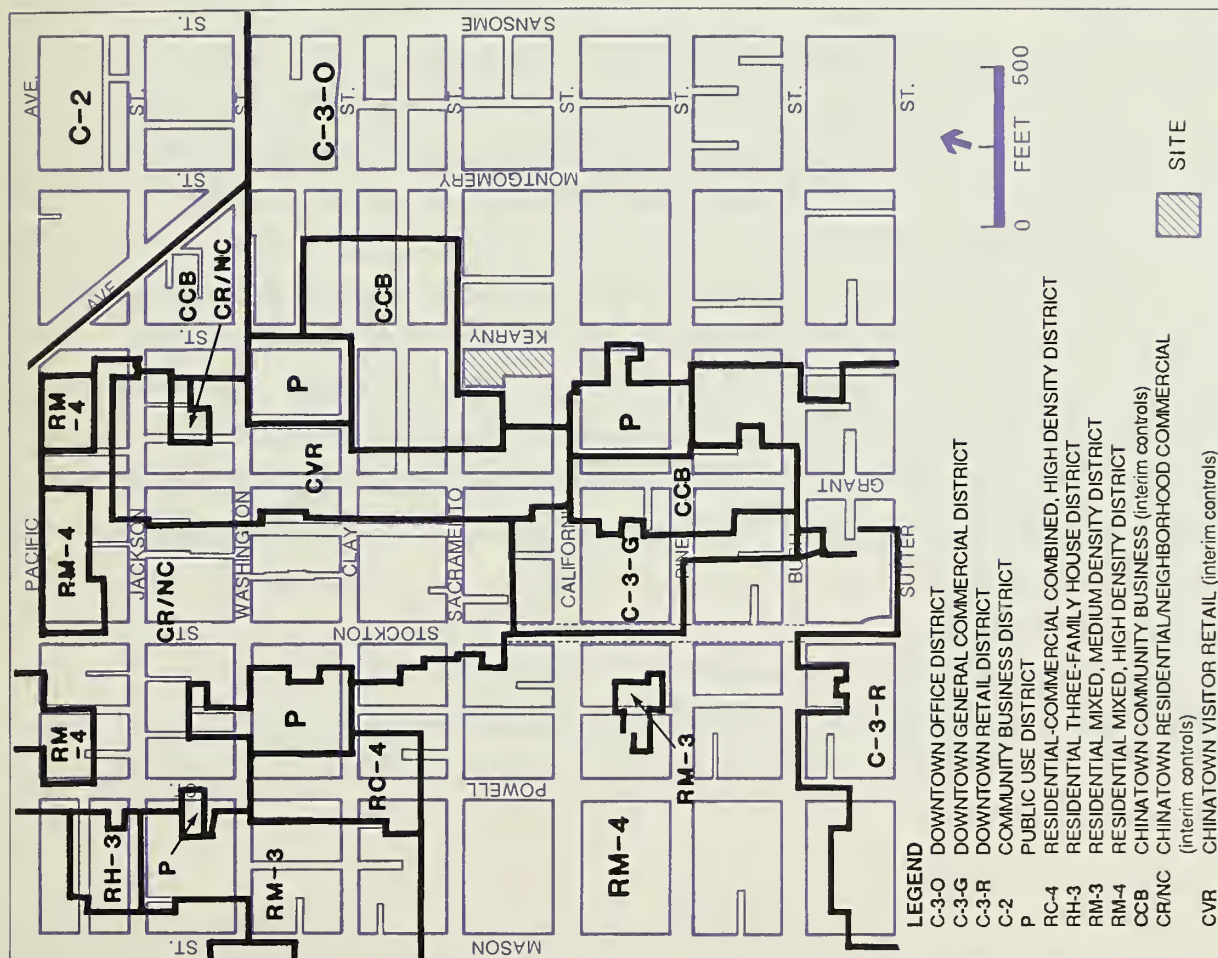
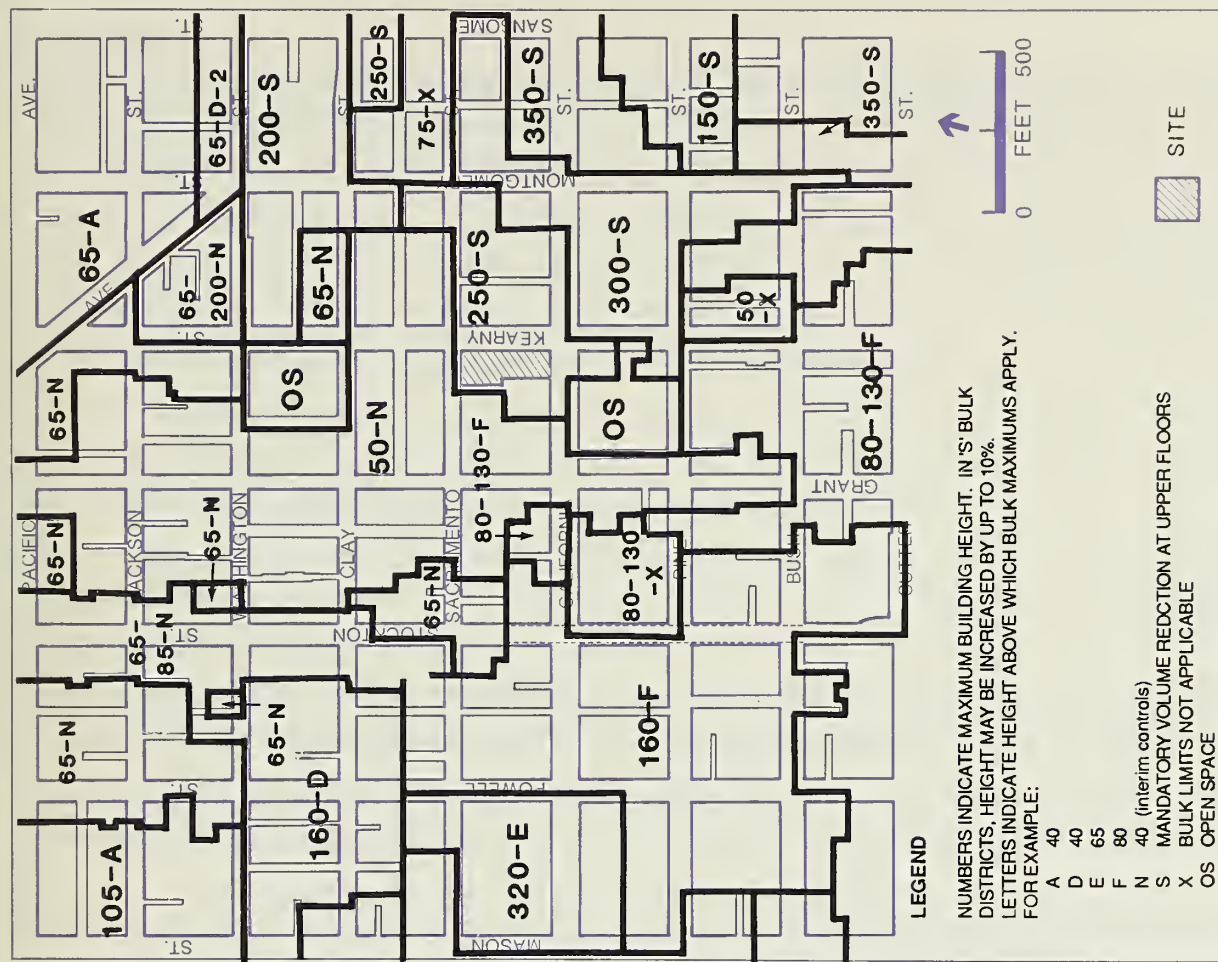
O		OFFICE		RESIDENTIAL
R		RETAIL/RESTAURANT		SCHOOL
S		SERVICE		CHURCH
F		FINANCIAL		PARK/PLAYGROUND/OPEN SPACE
M		MANUFACTURING		PARKING
W		WHOLESALE		VACANT BUILDING
		PRINTING		VACANT LOT
		UTILITIES		



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 13
LAND USE
IN THE PROJECT VICINITY



Under Section 149 of the Planning Code, one percent of the construction cost of a commercial development in the C-3-0 District must be devoted to publicly accessible works of art; additionally, on-site child care facilities, or in-lieu fees are required for commercial development which exceeds 100,000 gross sq. ft. in a C-3-0 district (Section 165 of the Code).

Zoning in the site vicinity includes a variety of use districts as shown in Figure 14, p. 44. The C-3-O (Downtown Office) use district is east of and includes the site; St. Mary's Square, south of the site, is zoned P (Public Use). Chinatown Interim Controls regulate the area north and east of the site and include, closest to the site, CCB (Chinatown Community Business), CR/NC (Chinatown Residential/Neighborhood Commercial), and CVR (Chinatown Visitor Retail).

The area subject to the Chinatown interim controls is within the Chinatown Plan study area. The Chinatown Plan is proposed as an area plan within the City's Master Plan. Goals of this area plan include protecting existing economic, social and cultural diversity; preserving existing housing and encouraging development of new affordable housing; protecting and facilitating the expansion of service and neighborhood serving retail activities; and preserving existing amenities and improving neighborhood livability.

Recognizing the potential for encroachment of downtown office use into Chinatown, the Department of City Planning has prepared the "Chinatown Preliminary Policy and Zoning Recommendations (April 1986)". The document was approved by the Planning Commission on June 24, 1986, with some revisions. The document includes preliminary proposed amendments to the City Master Plan and to the Planning Code, designed to protect residential and neighborhood-serving small-scale retail and service uses; architecturally significant buildings, residential uses, and sunlight access to sidewalks and parks. The document includes zoning which would change the maximum allowable height from 160 ft. to 50 ft. along Sacramento St. adjacent to the site on the west and to the north; change the Floor Area Ratio (FAR) for commercial development to 1:1, except along Kearny St (2.8:1) and Grant Ave. (2:1), from previous FAR limits of 3.6:1 to 6.0:1. Lots adjacent to and immediately north of the site, along Sacramento, Commercial, and Kearny Sts. would be rezoned to a CCB (Chinatown Community Business) district, and Grant Ave., would be rezoned to a CVR (Chinatown Visitor Retail) district. The current interim controls described above and shown on Figure 14, p. 44 implement the Chinatown Plan

recommendations. (Interim zoning was adopted by the Board of Supervisors, September 22, 1986. The controls expire on March 22, 1987 if final action ratifying the controls does not occur prior to that date.)

The site is outside the area regulated by the Chinatown Interim Controls. As described above, the Chinatown interim controls/study area adjoins the site to the west (along the Sacramento St. frontage) and to the north (across Sacramento St.).

B. CULTURAL RESOURCES

Archival research was done for the project. A study entitled, Archival Cultural Resource Evaluation for Federal Home Loan Bank Building, 600 California Street, April, 1986, was prepared by an independent consultant and is on file at the Department of City Planning, Office of Environmental Review, 450 McAllister St./1/ The study is summarized below.

No evidence exists for prehistoric activity at the project site or in its vicinity.

The earliest recorded history in the vicinity of the site dates from the Spanish-Mexican period (1776-1849). The site was located within the Yerba Buena Cove which remained in its natural state until the Spanish-Mexican period. As early as 1822, an Indian sweathouse existed on the corner of Sacramento and Montgomery St., one block east of the site; however, there is no evidence of a Native American settlement anywhere on the site block. At that time the area was known as the town of Yerba Buena. The first permanent structure in the site vicinity, built in 1836 by Jacob P. Leese, was located at the southwest corner of Clay and DuPont Sts. (Grant Ave.), about one block northwest of the site. Subsequently, extensive building took place near the site. Within a three-block radius of the site, commercial and domestic dwellings were erected rapidly from 1839 onward. These dwellings were owned and occupied by carpenters, blacksmiths and ship builders. It cannot be determined from available archival sources whether or not the site was actually developed at this time. It is likely that structures were located on or near the site as early as 1844.

Three other periods of activity on the site identified in the study were: the Gold Rush period (1849-1857); the City Building/Late Nineteenth Century period (1858-1906); and the Twentieth Century period (1906-present). The 1853 U.S. Coast Survey map shows five

structures within the project site. By 1857, the project site was almost completely covered by structures, including Chinese commercial enterprises, low-cost hotels, saloons, and French and German pharmacies. During the City Building period, the project site was the location of numerous commercial enterprises, including a Chinese Cigar Box Factory, a Bamboo Works, a gunsmith's shop, and the plumbing establishment of W.E. Lane; the site also included the Tremont Motel, on Kearny St., which contained the Eureka Beer Hall and ● a photo shop on the ground floor. The Nam Kue School, located at 755 Sacramento St., two lots west of the site, was constructed in 1907 and is the oldest Chinese language school in San Francisco. The Chinese Chamber of Commerce building, located at 730 Sacramento St., north of the site, was built in 1922.

Most recently, in 1954, the project site was developed with the existing 600 California St. office building, and in 1969, with the existing parking garage; and it is these buildings' uses that would be removed for the proposed project. The site condition at the time of the Spanish/Mexican period consisted of sand, a layer of about five to ten ft., overlying 10 ft. of clayey and sandy soil overlying bedrock. Since that time, the surface sand layer was removed for construction of the existing 600 California St. building in 1954 leaving the site at about 24 ft. San Francisco Datum.

Artifacts of consequence from the eras described above typically found at similar San Francisco sites include household effects such as porcelain and glass furnishings from the Gold Rush era, and Chinese effects such as household utensils, lacquered wood boxes, fans, cloth, jewelry, spiced perfumes, soap and cooking utensils from the Gold Rush and City Building eras. Such discoveries have served to expand the historic record of the people and events of these eras.

NOTE - Cultural Resources

/1/ Eleanor M. Ramsey, Ph.D., Mason-Tillman Associates, consulting archaeologists, conducted archival research for the project site and the surrounding area. The ensuing report, entitled Archival Cultural Resource Evaluation for Federal Home Loan Bank Building, 600 California Street, April 28, 1986, is on file at the Department of City, Planning, Office of Environmental Review, 450 McAllister Street.

C. URBAN DESIGN

The project site contains two buildings: 600 California St., a nine-story office building of the 1950s International style built in 1954, constructed of reinforced concrete clad in polished granite; and a two-story, three level concrete parking garage built in 1969, with reinforced steel grillwork screening the second floor and roof (see Figure 8, p. 30).

(Continues next page)

The project area is a mix of older (dating from 1906 to the 1920s) and newer (beginning in the 1950s) development. Older buildings tend to be of brick or a mix of brick and concrete, often with terra cotta ornamentation, recessed ornamented windows, single or double cornices, and distinct compositional elements; thus, they generally contain more surface ornamentation than more recently completed high-rise buildings. Newer development tends to be constructed of concrete, steel, and glass. Windows are generally flush with the facade and ornamentation is minimal. Building bases are minimally defined, and building forms tend to be unembellished rectangles. This is particularly true of buildings from the 1950s through mid-1970s. Buildings in the immediate site area such as the Bank of America Headquarters and the International Building and more recently 580 California St. include more articulation and variation of facade materials than some of their contemporaries.

Existing buildings on the project block range from two to 34 stories, with generally light-to-medium colors and facade materials, including light-colored stone and concrete, reddish-colored brick, steel, and glass. The Hartford Building, adjacent to the site on the west, was built in 1965. It is 34 stories tall, and faced in concrete with recessed glass windows.

The two-story St. Mary's Parish House, immediately west of the Hartford Building is faced in red brick, and has no facade ornamentation. St. Mary's Church, west of the parish house, at the intersection of California St. and Grant Ave., was constructed in 1854 and rebuilt in 1909. It is faced in red brick with light-colored stone. There is Gothic ornamentation above the door and window openings; there are turrets with spires at the corners of rooflines. The Nam Kue School building, at 755 Sacramento (on the project block west of the site), is two stories tall, faced in yellow stucco, with a green tile roof. Unlike most development in the project area, this building is set back from the street by a small courtyard with a decorative wrought-iron fence. The school is representative of Chinese architectural design, with a roof and porch incorporating upturned eaves, topped with fishes and dragons. West of the Nam Kue School, at the southeast corner of Sacramento St. and Grant Ave., is the 781 Sacramento St. building, constructed in 1907; it is three stories tall, faced in yellow-gold stucco, with Italianate detailing including a cornice with scroll-shaped brackets, and recessed, rounded arch windows.

Buildings in the area generally are built to lot lines and form continuous street frontages which define the grid street pattern of the Financial District and Chinatown. Open spaces

in the area are the private, publicly accessible A.P. Giannini Plaza adjacent to the Bank of America Headquarters Building, diagonally across California and Kearny Sts. from the site; St. Mary's Square, located one block southwest of the site; Portsmouth Square two blocks north of the site; and the Chinese playground one block west of the site. The International Building, south of the site across California St., has a private outdoor plaza on the west side of the building, on the fourth floor. The Hartford Building, has a private, (publicly accessible) plaza area at ground level which is overhung by the building and open on the sides. The Nam Kue School, three lots west of the site, on Sacramento St., has a 25' x 45' private playground at the rear of the building.

The site buildings are visible from locations on Kearny St. between Market St. to the south and Columbus Ave. to the north. Taller intervening buildings block views of the site from other points more distant than one block east of the site. California St. and Sacramento St. are view corridors towards the Bay. The view east along California St. from Nob Hill is terminated by the One Market Plaza complex; east along Sacramento St. from Nob Hill, the view is terminated by the Embarcadero Freeway and the Bay beyond, the Ferry Building is visible at the end of Sacramento St. Views west along California St. and along Sacramento St. are of the eastern side of Nob Hill.

D. SHADOW AND WIND

SHADOW

The existing nine-story building and three-story parking garage on the site cast shadows on Kearny and Sacramento Sts. adjacent to the site on the east and north, respectively. Existing development in the project area casts extensive shadow in the project vicinity.

Existing and project shadow patterns for various times of the day and year are discussed in detail in Chapter IV, Environmental Impact, pp. 92 to 103. Section 147 of the Planning Code states that any new development in the C-3 districts should be shaped, consistent with the dictates of good design and without unduly restricting the development potential of the site in question, to reduce substantial shadow impacts on public plazas and publicly accessible spaces. Factors to be taken into account in the determination of shadow impacts include: the amount of open area shadowed, the duration of the shadow, and the importance of sunlight to the utility of the type of open space being shadowed.

WIND

U.S. Weather Bureau data show that westerly (i.e., from the west) to northwesterly winds are the most frequent and strongest winds during all seasons in San Francisco./1/ Of the 16 primary wind directions measured at the Weather Bureau station (at a height of 132 ft.), four directions comprise the greatest frequency of occurrence as well as the majority of strong wind occurrences. These are northwest, west-northwest, west and west-southwest, with occurrence rates of about 10%, 14%, 35%, and 2%, respectively, of the time between the hours of 6 a.m. to 8 p.m. throughout the year. The remaining 12 wind directions comprise the remaining 36% frequency of annual occurrence with lower wind speeds. Calm conditions occur two percent of the time.

Average wind speeds are highest during summer and lowest during winter months. However, strongest peak winds occur in winter, when speeds of 47 mph have been recorded./2/ The highest average wind speeds are in the mid-afternoon, and the lowest are in the early morning.

Between the hours of 7 a.m. and 6 p.m. on an annual basis, wind speeds measured at the Weather Bureau station exceeded 21, 25, 21, and 18 miles per hour (mph) 10% of the time for northwest, west-northwest, west, and west-southwest winds, respectively, while the 12 remaining wind directions exceeded 15 mph 10% of the time.

Pedestrian Comfort and Wind Criteria

Wind conditions partly determine pedestrian comfort on sidewalks and in other public areas. In downtown areas, high-rise buildings can redirect wind flows around buildings and divert winds downward to street level; each can result in increased wind speed and turbulence at street level.

The comfort of pedestrians varies under different conditions of sun exposure, temperature, clothing, and wind speed. Winds up to four mph have no noticeable effect on pedestrian comfort. With winds from four to eight mph, wind is felt on the face. Winds from eight to 13 mph will disturb hair, cause clothing to flap, and extend a light flag mounted on a pole. For winds from 19 to 26 mph, the force of the wind will be felt on the body. At 26 mph to 34 mph winds, umbrellas are used with difficulty, hair is blown

straight, there is difficulty in walking steadily, and wind noise is unpleasant. Winds over 34 mph increase difficulty with balance and gusts can blow people over./3/

In order to provide a comfortable wind environment for people in the Downtown, Section 148 of the Planning Code establishes an equivalent (includes the effects of turbulence) windspeed (as defined in the Code) of seven and 11 mph as comfort criteria and 26 mph as a wind hazard criterion. Section 148 sets comfort levels of seven mph equivalent wind speed for public seating areas and 11 mph equivalent wind speed for areas of substantial pedestrian use. New buildings and additions to buildings may not cause ground level winds that would exceed these levels more than 10% of the time year round between 7:00 a.m. and 6:00 p.m. year round./4/ If existing wind conditions exceed the comfort level, new buildings and additions shall be designed to reduce ambient wind speeds to meet the requirements. A building may qualify for an exception to the standard that would allow it to add to the amount of time the comfort level is exceeded by the least practical amount if 1) it can be shown that the building or addition cannot be shaped and other wind baffling measures cannot be adopted to meet the foregoing requirements without creating an unattractive and ungainly building form and without unduly restricting development of the building site in question, and 2) it is concluded that, because of the limited amount by which the comfort level is exceeded, the limited location in which the comfort level is exceeded, or the limited time during which the comfort level is exceeded, the addition is insubstantial. No building or addition would be permitted that would cause wind speeds to exceed the hazard level, defined as an hourly average of 26 mph, for more than a single hour of any year.

Existing and project generated wind conditions are discussed in detail in Chapter IV, Environmental Impact, p. 103 to 105 and Appendix B, p. A-42.

NOTES - Wind

/1/ The U.S. Weather bureau data used in this analysis were originally gathered at the weather station atop the old Federal building at 50 United Nations Plaza during the years 1945-50. Data were taken hourly, annually for 16 wind directions. The data base, comprised of 32,795 hourly observations, is of sufficient length to provide a reliable estimate of future climatic conditions in San Francisco.

/2/ E. Jan Null, Climate of San Francisco, NOAA Technical Memorandum, NWS WR-126, February 1978.

/3/ Lawson, T.V., and A.D. Penwarden 1976, "The Effects of Wind on People in the Vicinity of buildings," Proceedings of the Fourth International Conference on Wind Effects on buildings and Structures, London, 1975, Cambridge University Press, Cambridge, U.K., 605-622.

/4/ Section 148 of the Planning Code specifies the hours of 7 a.m. to 6 p.m. The available weather data that cover that interval cover the hours of 6 a.m. to 8 p.m. Thus, observation from two additional evening hours and one additional morning hour are included in these data. Because, in general, winds are stronger in the afternoon and evening than in the morning, this approximation is conservative - it is likely to overestimate the existing and projected wind speeds.

E. TRANSPORTATION

The existing on-site 240-space garage provides valet parking for long- and short-term users. The existing Federal Home Loan Bank Building contains 29 ground-level parking spaces; thus there are a total of 269 existing spaces on the site. About 221 of these are used for long-term parking (vehicles stay more than four hours) and 48 are used for short-term parking (vehicles stay less than four hours). (A parking turnover survey was conducted at the garage and is presented in Appendix C, p. A-55. The survey indicates that a total of 240 vehicles use the garage and that 48 spaces operate as short-term while 192 operate as long-term; the 29 spaces, in the Federal Home Loan Bank Building, are long-term spaces, for a total of 221 long-term spaces.)

The site is served by local streets and by portions of the regional freeway system (see Figure 1, p. 19). Access to the freeway connecting with the East Bay via the Bay Bridge is provided by ramps at Clay and Battery Sts. (about 2,300 ft. northeast of the site) and at Mission and Beale Sts. (about 2,700 ft. southeast of the site). Access to the freeway connecting with the Peninsula and San Francisco International Airport is also provided by these ramps. Access from the freeway system to the project site is provided by off-ramps at Washington and Battery Sts. (about 2,400 ft. northeast of the site) and at Mission and Main Sts. (about 2,800 ft. southeast of the site).

The site is within the Downtown Core automobile control area designated in the Downtown Transportation Plan of the Transportation Element of the San Francisco Master Plan.^{1/} A Plan goal is to reduce the number of private commuter vehicles and excess automobile traffic in the Downtown Core; the Downtown Transportation Plan discourages the addition of new long-term parking spaces in and around downtown.

In the vicinity of the project site, California St., Sacramento St. and Kearny St., north of Sacramento St., are designated as Transit Preferential Streets, on which priority is given to transit vehicles over autos during commute and business hours on weekdays/1/; the site has frontage on all three. Kearny and Montgomery Sts. are designated as Primary Vehicular Streets, which the Master Plan defines as "major routes for automobiles and truck movements into and out of the Downtown area." California and Grant Sts. are designated as pedestrian-oriented streets; such streets are vehicular streets on which design measures should be implemented to improve mobility and to render existing pedestrian space more pleasant and efficient. The intersections of Kearny St. with California and Sacramento Sts. are both signal-controlled (as are the intersections of Grant Ave. with California and Sacramento Sts., about one block west of the project site).

Kearny St. is one-way, northbound and carries three lanes of traffic, with five during the p.m. peak period as there is no parking in the curb lanes between 4 p.m. to 6 p.m. Sacramento St. is one-way westbound and carries one lane of traffic. California St. is two-way with four lanes of traffic (two in each direction); the center lanes are shared with the cable car tracks.

The site is served by San Francisco Municipal Railway (Muni) electric trolley and motor coach lines, providing radial service to and from the downtown area. Muni bus lines operate on California, Kearny and Sacramento Sts., along the project site. The C-Cable Car line operates on tracks in the middle of California St. The closest Muni bus stops to the project site are on Sacramento St., at the northwest corner of its intersection with Kearny St., serving the 1-California; on Kearny St. at the northeast corner of its intersection with California St., serving the 9X-San Bruno Express and the 15-Third, and on California St. at its intersection with Kearny St., serving the C-cable Car line. Muni Metro light rail vehicle lines are accessible via the Montgomery St. Station of the Market St. subway, five blocks south of the project site. Transit routes in the project vicinity are shown on Figure 28, p. 110.

Market St. is located five blocks south of the site; it is designated a Transit Thoroughfare in the Market Street Planning Project Final Report (November 1985). In August 1985, Muni began a nine-month trial operation of four-lane service on Market St. between the Financial District and Civic Center; this program will continue indefinitely and has

improved service transit along Market Street./2/ Improvements along Market St. in the vicinity of the project include relocated bus stops to conform with the provision of four transit lanes.

Regional transit service to the site is provided to and from the East Bay by the Bay Area Rapid Transit District (BART) at the Montgomery Station on Market St. (about five blocks southeast of the site), and by AC Transit motor coaches at the Transbay Transit Terminal, on Mission St. at First St., about seven blocks southeast of the project site.

Service to the Peninsula is provided by Caltrain from the train terminal at Fourth and Townsend Sts.; by the San Mateo County Transit District (Samtrans), with bus routes and stops along Kearny and Montgomery Sts. and Mission St. (the closest to the site is one block south); and by BART, which provides transfers to Samtrans routes at the Daly City BART Station. In addition, independently owned and operated jitneys provide service along the entire length of Mission St. (from The Embarcadero to Daly City) during a.m. and p.m. commute hours.

The Golden Gate Bridge, Highway and Transportation District (Golden Gate Transit) provides a.m. and p.m. peak-period bus service from/to Marin and Sonoma Counties. The closest discharge (inbound) stop to the project site is located on Battery St. at Sacramento St. (about three block east of the site); the closest boarding stop (outbound) to the project site is on Sansome St. at Sacramento St. (about two blocks east of the site). Golden Gate Transit also provides ferry service to terminals in Larkspur and Sausalito from the Ferry building (about 3,500 ft. east of the site). They operate shuttle service from the Ferry Building to the Financial district and the South-of-Market area; the closest shuttle stop to the project site is at Montgomery and Sacramento Sts.

Golden Gate Transit also operates a vanpool and club (subscription) bus program to areas not served by fixed routes. The RIDES carpool program, operating as a nonprofit, publicly funded corporation, provides consulting and matching services to help establish Bay Area carpools and vanpools. There are about 1,240 combined carpools and vanpools on the Golden Gate Bridge during the a.m. peak hour, carrying about 4,500 people daily (average occupancy of 3.6 persons per ridesharing vehicle)./3/ The Bay Bridge has about 2,800 carpools during the a.m. peak hour; carpools from/to the East Bay carry about 10,900 people daily (an average occupancy of 3.9 persons per carpool vehicle)./4/

Pedestrian activity around the site during the peak periods of 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m. is directed primarily to and from transit and parking facilities. Peak afternoon pedestrian flows are generally more intense than those of the morning period. Noon hour flows are similar to afternoon flows and are directed primarily to restaurants and retail stores within the downtown area.

Sidewalk widths on Kearny, Sacramento and California Sts. in front of the project site are restricted by trash cans, news stands, fire hydrants, parking meters, street trees and poles. The effective clear width of the Kearny St. sidewalk is 10.0 ft., about 69% of the full width of 14.5 ft. The effective clear width of the Sacramento St. sidewalk is 6.8 ft., about 68% of the full width of 10.0 ft. The effective clear width of the California St. sidewalk is 10.75 ft. about 73% of the full width of 14.8 ft.

The Kearny St. and California St. sidewalks in front of the project site, currently operate in unimpeded conditions during both the noon and p.m. peak periods. The Sacramento St. sidewalk in front of the project site currently operates in open conditions during the noon 15-minute peak period and unimpeded conditions during the p.m. 15-minute peak period. The crosswalks across Kearny St. (closest to the project site) at both California and Sacramento Sts. and the crosswalk across Sacramento St. (closest to the project site) all operate in unimpeded conditions during both the noon and p.m. peak periods. The crosswalk across California St. (closest to the project site) operates in impeded conditions during the noon peak period and unimpeded conditions during the p.m. peak period./5/

The estimated parking demand (both long-term and short-term) from the C-3 District in 1984 was found to be about 45,300 spaces, which would occupy about 94% of the 48,000 parking spaces in and near the C-3 District.

NOTES - Transportation

/1/ San Francisco Department of City Planning, January 1983, Transportation, An Element of the Master Plan.

/2/ K. L. Wong, Muni Planning Division, telephone conversation, May 6, 1986.

/3/ Maria Thayer, Golden Gate Bridge, Highway and Transportation District, telephone conversation, December 2, 1985.

/4/ Traffic Survey Services MA-60, Bay Bridge, Metropolitan Transportation Commission, spring 1985.

/5/ Pedestrian counts conducted by ESA on Monday, May 19, 1986, from 12:00 p.m. to 1:00 p.m. and 4:30 p.m. to 5:30 p.m.

F. AIR QUALITY

The Bay Area Air Quality Management District (BAAQMD) operates a regional monitoring network which measures the ambient concentrations of six air pollutants: ozone (O_3), carbon monoxide (CO), total suspended particulates (TSP), lead (Pb), nitrogen dioxide (NO_2), and sulfur dioxide (SO_2). On the basis of the monitoring data, the Bay Area, including San Francisco, currently is designated a non-attainment area with respect to the federal ozone and CO standards. A four-year summary of the data collected at the BAAQMD monitoring station nearest the project site (about three miles south at 900 23rd St.) is shown in Appendix D, p. A-58, together with the corresponding federal and/or state ambient air quality standards. In 1985, there were five violations of the previous state 24-hour average TSP standard. In 1984, there was one violation of the state ozone standard, and five violations of the previous state 24-hour average TSP standard; in 1983, there was one violation of the federal and state one-hour average ozone standards and four violations of the previous state 24-hour average TSP standard; in 1982 there was one violation of the federal and state eight-hour CO standard and three violations of the state 24-hour average TSP standard./1/

BAAQMD has conducted several CO "hotspot" monitoring programs in the Bay Area, including two in San Francisco. One CO monitoring program was conducted during the winter of 1979-80 at the intersection of Washington and Battery Sts., about 900 ft. northeast of the site./2/ The high eight-hour average concentration was 10.1 ppm, which violates the 9-ppm state and federal standards by 1.1 ppm. The high one-hour average concentration of 15 ppm does not violate the 20-ppm state standard or the 35-ppm federal standard. Another CO monitoring program was conducted during the winter of 1980-81 at the intersection of Geary and Taylor Sts., about 0.5 mile southwest of the site, and 100 Harrison St. at Spear, about 0.9 mile southeast of the site./3/ At Geary and Taylor the observed high eight-hour average concentration was 11.5 ppm, which violates the standards by 2.5 ppm, and the high one-hour concentration was 15 ppm, which does not violate the standards. At Harrison St., the observed high eight-hour and one-hour average concentrations were 7.8 ppm and 13 ppm, respectively, which do not violate standards. These data indicate that locations in San Francisco near streets with high

traffic volumes and congested flows may experience violations of the eight-hour CO standard under adverse meteorological conditions. In December 1985, the City monitored CO and counted traffic at the Sixth and Brannan intersection. These data are still being analyzed.

Comparison of the data with those from other BAAQMD monitoring stations indicates that San Francisco's air quality is among the least degraded of all the developed portions of the Bay Area. Three of the four prevailing winds, west, northwest, and west-northwest blowing off the Pacific Ocean, reduce the potential for San Francisco to receive pollutants from elsewhere in the region.

San Francisco's air quality problems, primarily CO and TSP, are due largely to pollutant emissions from within the City. CO is a non-reactive pollutant and its major source is motor vehicles. CO concentrations are generally highest during periods of peak traffic congestion or adverse meteorology. TSP levels are relatively low near the coast, increase with distance inland, and peak in dry, sheltered valleys. The primary sources of TSP in San Francisco are demolition and construction activities, and motor vehicle travel over paved roads.

San Francisco contributes to regional air quality problems, primarily ozone, a regional problem in other parts of the Bay Area. Ozone is not emitted directly from sources, but is produced in the atmosphere over time and distance through a complex series of photochemical reactions involving hydrocarbon (HC) and nitrogen oxide (NO_x) emissions, which are carried downwind as the photochemical reaction occurs. Ozone standards are violated most often in the Santa Clara, Livermore, and Diablo Valleys, because local topography and meteorological conditions favor the buildup of ozone and its precursors there.

In 1982, emissions from motor vehicles were the source of 86% of the CO, 46% of the HC, 44% of the TSP, and 56% of the NO_x emitted in San Francisco, while power plant fuel combustion was the largest single source of sulfur oxides (SO_x), about 33% of the total.^{4/} These percentages are expected to apply reasonably well to current conditions.

In response to the Bay Area's ozone and CO non-attainment designations, the Association of Bay Area Governments (ABAG), BAAQMD, and the Metropolitan Transportation Commission (MTC) prepared and adopted the 1982 Bay Area Air Quality Plan, which

establishes pollution control strategies to attain the federal ozone and CO standards by 1987 as required by federal law./5/ These strategies were developed on the basis of detailed subregional emission inventories and projections, and mathematical models of pollutant behavior, and consist of stationary and mobile source emission controls and transportation improvements. The BAAQMD, MTC, and California Bureau of Automotive Repair (a state agency) have primary responsibility for implementation of these strategies.

NOTES - Air Quality

/1/ State standards for particulate matter changed in 1983 to concentrate on fine particulate matter, which has been demonstrated to have health implications when inhaled. Concentration standards also changed. There is not yet an adopted method for monitoring fine particulate matter. Until the State adopts a method, it is not possible to determine what proportion of TSP in San Francisco would be subject to review against the new standards.

/2/ Association of Bay Area Governments, AQMP Tech Memo 33, "Summary of 1979/80 Hotspot Monitoring Program," Berkeley, California, June 1980.

/3/ Association of Bay Area Governments, AQMP Tech Memo 40, "Results of the 1980/81 Hotspot Monitoring Program for Carbon Monoxide," Berkeley, California, January 1982.

/4/ Bay Area Air Quality Management District (BAAQMD), "Base Year 1982 Emissions Inventory, Summary Report," San Francisco, California, November 1, 1983.

/5/ Association of Bay Area Governments (ABAG), BAAQMD, and MTC, 1982 Bay Area Air Quality Plan, Berkeley, California, December 1982.

IV. ENVIRONMENTAL IMPACTS

An application for environmental evaluation for a development proposal on the site was filed on February 14, 1986. On July 11, 1986, on the basis of an Initial Study, the Department of City Planning, Office of Environmental Review, determined that a tiered Environmental Impact Report (EIR) was required. Issues determined as a result of the Initial Study to require no further environmental analysis included: Land Use, Reflected Light and Glare, Population (except project-specific employment), Construction and Operational Noise, Construction Air Quality, Utilities/Public Services, Biology, Geology/Topography, Water, Energy/Natural Resources, Hazards, and Architectural Resources. Therefore, except as noted below, this document does not discuss these topics (see Appendix A, pp. A-2 to A-41, for the Initial Study). Based on the proximity of the site to the Chinatown Plan Interim Controls area, Land Use has been included in the Environmental Impact Report, and subsequent to the Initial Study, the Department determined that Construction Noise required further analysis. Therefore, these topics are included in the EIR. The Residence Patterns and Housing discussion on pp. 136 to 137 has been added for informational purposes.

This tiered EIR has been prepared for the project pursuant to Sections 21093 and 21094 of the California Environmental Quality Act (CEQA). The EIR is tiered from the EIR for the Downtown Plan (EE81.3, Final EIR certified October 18, 1984). The 600 California St. EIR analyzes project-specific impacts. It discusses potentially significant effects of the project that were not examined in the Downtown Plan EIR and includes applicable mitigation measures for site-specific effects. The analysis identifies the project portion of the relevant cumulative impacts forecast in the prior EIR.

The Downtown Plan EIR process included development of a complex and sophisticated economic forecast of employment growth, and computerized transportation and air quality models for calculating and predicting cumulative impacts of development in the downtown C-3 districts to the year 2000. Development of the forecast and transportation and air quality models, and presentation of their analyses in the EIR required several years of work. The Downtown Plan EIR, from which this later single-project EIR is

tiered, includes about 600 pages of Comments and 400 pages of Responses to those comments. The Downtown Plan Final EIR was certified October 18, 1984.

The Downtown Plan, itself, was approved by the Planning Commission on November 29, 1984, and its implementing ordinances were approved by the Board of Supervisors (Ordinance 414-85 approved September 10, 1985), effective October 17, 1985. The approval process thus took place over about 12 additional months subsequent to the EIR process and included public hearings and testimony. Discussion of, as well as explanation and clarification of issues and information in, the Downtown Plan EIR included exhaustive review in public forums, during the EIR process and the Plan approval process, before the Planning Commission and the Board of Supervisors.

The Downtown Plan EIR forecasts and analyzes the effects of cumulative development (including those of the project) in the Downtown C-3 district, to the year 2000. That analysis remains current and valid for future and project conditions, and thus, the project is not subject to CEQA Section 21166 regarding changed circumstances or new information.

As noted, the EIR cumulative impact analysis relies on the Downtown Plan EIR (DTPEIR) cumulative impact analysis, and that analysis remains valid. The current validity or "freshness" of the DTPEIR assumptions and analysis was recently established in the Final EIR (FEIR) for 235 Pine St. (84.432E, certified April 17, 1986). The material contained in the 235 Pine St. Draft Summary of Comments and Responses, at pp. 9-21, 25-30, 32-38 and 54-59 is summarized below and incorporated by reference herein.

The 235 Pine St. EIR Comments and Responses discuss the current validity of the Downtown Plan EIR assumptions and analysis with regard to development and land use forecasts, employment growth, transportation impacts, office rental and vacancy rates and housing production. The DTPEIR forecasts are considered to be long-term forecasts that focus on the amounts and types of growth expected through the year 2000. No attempt was made to forecast on an annual or short-term basis, and the long-term forecasts include a number of shorter-term ups and downs which average out over time. In general, it was concluded in the 235 Pine FEIR that no new data or information are available that would indicate that the long-term forecasts prepared for the DTPEIR are substantially off-target or misleading. With regard to the more specific issues such as

transportation impacts, office vacancy rates, housing impacts, etc., it was concluded that the assumptions in the DTPEIR remain valid and the analysis remains current.

Thus, for example, it was concluded that the recent drop in gasoline prices in early 1986 was temporary and would not cause long-term shifts in mode split from transit to auto use. This is due not only to the temporary nature of the gas price drop (as of September 1986, prices have stabilized) but also to the fact that bridges and freeways providing access to San Francisco were generally at or near capacity during the p.m. peak at the time the DTPEIR baseline analyses were done, and are expected to continue to be at or near capacity, with increases in peak-of-the-peak over time (235 Pine Comments and Responses, p. 26; DTPEIR Vol. I, pp. IV.E. 32 & 34). While driving may temporarily appear attractive to some commuters, length of time of commute would deter others or cause shifts to carpools or transit by other drivers in the "push-pull" relationship between traffic congestion and transit ridership (see 235 Pine Comments and Responses, p. 27).

It was also concluded that housing completions in San Francisco were about 940 units in 1983-84 and about 1,000 units in 1985. These figures fall squarely within the DTPEIR forecast of 600-1,500 units per year on average (235 Pine St. Comments and Responses, p. 54). Similarly, the recent increase in office vacancy rates was forecast in the DTPEIR which anticipated that space approved in the mid-late 1980s would not be absorbed by 1990 (see 235 Pine St. Comments and Responses, pp. 21 and 34; DTPEIR Vol. 1, pp. IV.B. 23-29; Vol. III, Part 1, pp. C&R-B. 10-11).

Comments on this single-project EIR for 600 California St. are to be confined to those matters analyzed in this EIR, related to project-specific effects and the relation of this project to relevant cumulative impacts. Insofar as the Downtown Plan EIR is a final, certified document, it would be inappropriate to reopen the EIR process by accepting further comments on that EIR. Therefore, comments on material contained in the prior EIR from which this project-specific EIR is tiered will not be accepted.

Some of the effects presented in this Impact Chapter are not physical effects as defined by CEQA. They are included in the EIR for informational purposes only.

As discussed in the Initial Study, the project would be consistent with the Downtown Plan policies and ordinances for which a Final EIR (EE81.3) was certified October 18, 1984. The project's consistency with these local land use plans and zoning meets the CEQA requirements for a tiered EIR.

A. LAND USE AND ZONING

LAND USE

The following paragraph summarizes material from the Downtown Plan EIR. This summarized material is found on the following pages of the Downtown Plan EIR which are incorporated by reference:

Volume I: Final EIR text. Pages I.B.1-I.C.5; II.8-11; IV.B. 18-90; IV.C.29-61.

Volume II: Appendices. Appendices G and H.

Volume III: Part 1: Responses. Section B.

The Downtown Plan EIR provides forecasts of amounts of space likely to be found in the C-3 District in the future and of the numbers of employees likely to be working in the C-3 District in the future. These forecasts are described in detail; the results are found in the various tables in the EIR. Table IV.B.10, page IV.B.33 shows about 125,243,000 sq. ft. of space in the year 2000, of which about 78.9 million would be in office uses. Table IV.C.15, page IV.C.41 shows total employment forecasts of about 372,000 persons in 2000, in the C-3 District.

The project would replace existing office and parking uses at the site with similar uses. Office uses would be at a greater intensity, retail would be introduced to the site, and parking would be reduced by about 37 spaces. The intensification of office uses at the site, which would result from the project, would continue high-rise office development in the site vicinity. Traditionally, the northwestern Financial district has been characterized by office uses and downtown support businesses such as parking, retail, printing, and other services. Some older buildings in the area, which typically house these uses, have been replaced by high-rise office buildings, such as the International, Hartford, Bank of America, and 580 California buildings.

The project would require demolition of two buildings, a nine-story office building and a two-story (with rooftop use) parking structure, for construction of an office and retail building stepped down from 18 stories at California and Kearny Sts., to nine stories with a three-story portion along the western third of the Sacramento St. frontage. The site contains office and downtown support uses (a car rental office and a parking garage). The

project would replace these uses with a building containing about 312,700 gsf of office space, a net increase of about 216,100 sq. ft.; about 7,900 gsf of retail space, all of which would be a net increase; about 90,600 gsf of parking space (232 spaces), a net increase of about 22,200 gsf (but a net decrease of 37 spaces), and about 10,400 sq. ft. (all net new) of open space.

The 600 California St. project, located within the C-3-O district, would be consistent with the designated primary use of the District under the Downtown Plan; that is, high-density office and retail (p. 24 of the Downtown Plan).

The project would be consistent with the description of the C-3-O (Downtown Office) district described in Article 2, Section 210.3 of the City Planning Code. The section states that the district "playing a leading national role in finance, corporate headquarters and service industries and serving as an employment center for the region, consists primarily of high quality office development."

Parts of the northwestern Financial district, particularly northeast of the project block, have recently been developed with high-rises such as the Montgomery/Washington tower, Bank of Canton, and 456 Montgomery St.; 580 California St. was recently completed directly east across Kearny St. from the site, the 505 Montgomery St. tower is under construction one block northeast of the site. The project would be similar in scale and use to high-rise development south, southeast, and east of the site; it would be smaller than high-rise development immediately south, east and west. The project would differ in scale and use from development on the project block west of the Hartford Building, development north and west of the project site, and with lower scale development farther south along Kearny St.; the project would be larger than these developments. The project would represent the continuing intensification of downtown financial district uses at the western boundary of the C-3-O district.

Recognizing the potential for encroachment of downtown office uses into Chinatown, the Department of City Planning has prepared Chinatown Preliminary Policy and Zoning Recommendations (April 1986) designed to protect the Chinatown area's existing economic, social and cultural diversity; preserve existing housing and encourage new affordable housing; protect and facilitate the expansion of service and neighborhood-serving small-scale retail and service activities; and preserve existing amenities and improve neighborhood livability including preserving architecturally

significant buildings and sunlight access to sidewalks, parks, and public open space. The City Planning Commission adopted the Interim Zoning Controls on June 24, 1986 and the Board of Supervisors adopted the Interim Controls on September 22, 1986. The Interim Controls were signed by the Mayor on October 3, 1986. The area subject to the Chinatown Interim Controls is bounded roughly by Columbus Ave. and the Downtown C-3-0 District on the east, Stockton and Powell Sts. on the west, Vallejo and Green Sts. on the north, and Bush and Sacramento Sts. on the south. The permanent zoning controls proposed by the Department for Chinatown would create three use district subareas, each with its own controls, to encourage retention of existing primary uses and to facilitate controlled expansion of similar uses. The subareas would be designated as CCB (Chinatown Community Business), CVR (Chinatown Visitor Retail), and CR/NC (Chinatown Residential/Neighborhood Commercial). The site is outside of and adjacent to the Interim Controls/Chinatown study area.

THE DOWNTOWN PLAN

The Downtown Plan, part of the Master Plan, effective October 17, 1985, and as implemented by the Planning Code, contains comprehensive controls regarding the scale, intensity, and location of growth in downtown San Francisco; architectural preservation; open space; sunlight access; wind criteria; and transportation. The relationship of the project to the major sections of the Downtown Plan is discussed here and summarized in Table 2, pp. 65 to 70.

Under the Downtown Plan, the basic FAR for the C-3-0 district, including the project site, is 9:1. Floor Area Ratio is the ratio of gross floor area of the building to site size. A number of building uses may be excluded from the gross floor area calculation. The Downtown Plan and Planning Code (Section 102.8(b)1-16) include allowable exemptions from gross floor area for the FAR calculation including, for example, ground-floor building service and internal circulation; replacement short-term parking if required by the City Planning Commission, cultural, religious and social service areas; and ground-floor (and mezzanine-level, subject to approval under Section 309) retail, restaurant, and personal service space up to 75% of ground-floor interior and open space areas, and parking equal to, or less than, seven percent of the gross floor area. Development greater than the basic 9:1 FAR is allowable up to a maximum of 18:1 FAR, through transfer of development rights (TDR), from sites within the same zoning district

TABLE 2: RELATIONSHIP OF THE PROJECT TO THE DOWNTOWN PLAN PLANNING CODE REQUIREMENTS

	<u>Planning Code Requirements/Limits</u>	<u>Project</u>
Height (Sections 260 and 263.9)	275 ft./a/	244/138 ft./b/
Base Height (Floors 1 to 9)	106 ft.	106 ft./c/
Bulk (Section 270)		
Lower Tower (Floors 10 to 13)		
Length	160 ft.	155 ft.
Diagonal	190 ft.	170 ft.
Maximum Average Floor	17,000 sq. ft.	13,190 sq. ft.
Maximum Floor	20,000 sq. ft.	13,190 sq. ft.
Upper Tower (Floors 14 to 18)		
Length	130 ft.	155 ft.
Diagonal	160 ft.	170 ft.
Maximum Average Floor	12,000 sq. ft.	12,740 sq. ft.
Maximum Floor	17,000 sq. ft.	13,190 sq. ft.
Volume Reduction (above 160 ft.)	10%	5%
FAR (Section 124)	9:1 Basic, 18:1 Maximum with TDR	11:1
TDR (Section 128)	Plan allows for transfer of development rights from buildings designated as Category I-IV for architectural merit.	65,700 sq. ft. of TDR would be used on the development site.
Architectural Resources (Article II)	Designates buildings in Categories I to IV, and into six Conservation Districts, based on architectural merit, with related provisions regarding preservation.	Not applicable. Buildings on-site are not in any Category or within a designated Conserva- tion District.
Open Space (Sections 138 and 139)	One sq. ft. per 50 sq. ft. of office and retail space (and ancilliary space such as mechanical and storage but not including parking), or 8,020 gross sq. ft. for the project; the project proposes 10,400 gross sq. ft. of open space or 2,380 gross sq. ft. in excess of the requirement	10,400 sq. ft. on site: (7,300 sq. ft.) outdoor terrace on the rooftop of the 18-story southern tower, and (3,100 sq. ft.) in a galleria along California St.

(continued)

TABLE 2: RELATIONSHIP OF THE PROJECT TO THE DOWNTOWN PLAN PLANNING CODE REQUIREMENTS

	<u>Planning Code Requirements/Limits</u>	<u>Project</u>
(Cont.) Open Space (sections 138 and 139)	(based on 401,000 gross sq. ft.) and contribution of \$2.00 for each net new gross sq. ft. of office to Downtown Park Fund (\$432,000 for project).	
Shadow (Sections 147 and 295)	Minimize substantial shadow impacts on public plazas and other publicly accessible spaces, without unduly restricting development potential; consider duration, area, and importance of sunlight to utility of open space. Proposition K, the Shadow Ban Initiative, requires disapproval of any project shading Recreation and Park Department property between one hour after sun- rise and one hour before sunset, unless adverse effects of such shadows are found to be insignificant.	Project would not add new shadow to any public open space. The project would not cast any new shadow on property under the juris- diction of Proposition K.
Wind (Section 148)	Ground-level winds may not exceed (more than 10% of the time year round between 7 a.m. and 6 p.m.) 11 mph in areas of substantial pedestrian use and 7 mph in public seating areas. Wind speeds may not exceed the hazard level, defined as an hourly average of 26 mph, for more than a single hour of any year.	At one location, on the roof of the existing 600 California building, the 26 mph hazard criteria is exceeded with current conditions. The project would cause wind speeds to increase at five locations (by one to four mph), to remain the same at 11 locations, and to decrease at six locations (by one to eight mph) The project would cause violations of the 11 mph pedestrian comfort criterion at one location along California St. Winds at the A.P. Giannini Plaza would continue to violate applicable comfort criteria.

(continued)

TABLE 2: RELATIONSHIP OF THE PROJECT TO THE DOWNTOWN PLAN PLANNING CODE REQUIREMENTS

	<u>Planning Code Requirements/Limits</u>	<u>Project</u>
(Cont.) Wind (Section 148)		<p>Winds in St. Mary's Square would be unchanged at one location and decreased at one; both locations would continue to exceed the 7 mph seating criterion. The 7 mph seating criterion would also be exceeded at the proposed open space on the roof of the 18-story portion of the building. The</p> <ul style="list-style-type: none"> ● project would require allowable exceptions to City Planning Code Section 148 for increased winds above 11 mph, noted above, and to continue existing exceedances of the comfort criteria as follows: to continue existing exceedances of the 11 mph criteria at nine other locations (the north side of California St. at the site's western boundary; the south side of California St. at the International Building's northwest boundary; the northeast, northwest, southeast, and southwest corners of the intersection of California and Kearny Sts.; the south side of California St. in front of the A. P. Giannini Plaza; and two locations within the A.P. Giannini Plaza), and to continue exceedances of the 7 mph criterion, on the rooftop of the proposed building, and at two locations in St. Mary's Square.

(continued)

TABLE 2: RELATIONSHIP OF THE PROJECT TO THE DOWNTOWN PLAN PLANNING CODE REQUIREMENTS

	<u>Planning Code Requirements/Limits</u>	<u>Project</u>
Art (Section 149)	Publicly accessible art equal to one percent of construction cost.	Project would comply, in a manner to be determined.
(Off-Street Loading	The equivalent of three spaces. (0.1 spaces per 10,000 sq. ft. office, no spaces for the less than 10,000 sq. ft. of retail.)	Project would comply, with three truck loading docks.
Parking (Section 155.(g))	Rate structure to encourage short-term use and discourage long-term use. Planning Commission may approve replacement short-term parking, which would then be exempt from FAR.	232 spaces would be provided. Rate structure would encourage short-term use for 48 replacement short-term spaces and any additional spaces designed as short-term (pursuant to Section 303). Forty-eight short-term and 82 long-term spaces are proposed; it has not been determined whether the remaining 102 spaces would be long- and/or short-term spaces. Vanpool and bicycle parking would be provided.
Transportation Broker (Section 163)	Required.	Would be provided by building management

(Continued)

TABLE 2: RELATIONSHIP OF THE PROJECT TO THE DOWNTOWN PLAN PLANNING CODE REQUIREMENTS

	<u>Planning Code Requirements/Limits</u>	<u>Project</u>
Housing	● OAHPP requires 84 units for the proposed 216,100 net new sq. ft. of office./d/	Sponsor would contribute funds for construction of a low- and moderate-income housing project.
Employment (Section 164)	Local employment program and employment brokerage services required for buildings exceeding 100,000 sq. ft. to encourage employment and work training for San Francisco residents.	Building management to provide brokerage services.
Childcare (Section 315)	On-site childcare services, participation in childcare consortium or brokerage, or payment of in-lieu fee of \$1.00 times net new office sq. ft. required (\$220,000 for project.)	Project would comply, in a manner to be determined.

SECTION 309: EXCEPTIONS REQUIRED FOR THE PROJECT

Section 132.1(c)2(B). Separation of Towers

Requirement: Minimum setback above base of 15 ft. from interior property line or center line of street.

Exception: The project would be set back less than the required amount along a portion of the west (interior) property line. The center of the west wall of the southern portion of the building would be set back from the interior property line by about 10 ft. (at the mechanical core), five feet less than the required amount (above the base). (The rest of the west wall of the southern portion of the building would be set back 15 ft. from the interior property line, as required). The west wall of the northern portion of the building would not be set back from the interior property line, and thus would not meet the 15 ft. setback requirement. Exception to the Separation of Towers requirement is allowable in accordance with the provision of Section 309 under Section 132.1(c)2 if at least one of the criteria under Section 132.1(c)2.A-C is met.

Section 148(a). Reduction of Ground Level Wind Currents in C-3 Districts.

Requirement: Ground-level winds may not exceed (more than ten percent of the time year round between 7 a.m. and 6 p.m.) 11 mph in areas of substantial pedestrian use and 7 mph in public seating areas.

(Continued)

TABLE 2: RELATIONSHIP OF THE PROJECT TO THE DOWNTOWN PLAN PLANNING CODE REQUIREMENTS

- Exception: The project would require allowable exceptions to City Planning Code Section 148 for increased winds above 11 mph, noted above, and to continue existing exceedances of the comfort criteria as follows: to continue existing exceedances of the 11 mph criteria at nine other locations (the north side of California St. at the site's western boundary; the south side of California St. at the International Building's northwest boundary; the northeast, northwest, southeast, and southwest corners of the intersection of California and Kearny Sts.; the south side of California St. in front of the A. P. Giannini Plaza; and two locations within the A.P. Giannini Plaza), and to continue exceedances of the 7 mph criterion, on the rooftop of the proposed building, and at two locations in St. Mary's Square.

Section 155(g). Short-term Parking Rate Structure

Requirement: Rate structures in the C-3 Districts shall be "such that the rate charge for four hours of parking duration is no more than four (4) times the rate charge for the first hour, and the rate charge for eight or more hours of parking duration is no less than ten times the rate charge for the first hour. Additionally, no discounted parking rate shall be permitted for weekly, monthly or similar time-specific periods."

Exception: Forty-eight short-term parking spaces are proposed with a short-term rate structure and 82 long-term parking spaces are proposed without a short-term rate structure. The sponsor would apply for Conditional Use authorization for additional 102 spaces for a total of 232 spaces altogether. The 102 spaces could be long- or short-term. The Planning Code does not require parking for office and retail uses in the C-3 districts. The Planning Code does not prohibit long-term parking. There is no allowable exception to Section 155(g) under Section 309; the project sponsor has requested an opinion from the Zoning Administrator on whether a variance could allow a long-term rate structure for the proposed long-term spaces.

Section 270(c)2. Bulk Limits

Requirement: Upper tower: maximum length of 130 ft., maximum diagonal of 160 ft., maximum average floor size of 12,000 sq. ft., and volume reduction (above 160 ft.) of about 10%.

(Continued)

TABLE 2: RELATIONSHIP OF THE PROJECT TO THE DOWNTOWN PLAN PLANNING CODE REQUIREMENTS

Exception: The upper tower (floors 14–18) would have a maximum length of 155 ft., a maximum diagonal of 176 ft., and a maximum average floor size of about 12,740 sq. ft., thereby exceeding the specified Code maximums by 25 ft., 10 ft., and 740 sq. ft. respectively. The project would include a volume reduction of about five percent, (five percent less than the 10% required). Exception to the bulk requirements is allowable in accordance with the provisions of Section 309 under Section 272 (a) if at least one of the criteria under Section 272(a) 1–5 is met.

/a/ According to Section 263.9(a), in an S district additional height up to 10% (in this case 25 ft.) of the allowable height (in this case 250 ft.) may be permitted as an extension of the upper tower provided that the volume of the upper tower is reduced by the percentage shown in Chart B of Section 270(c). In addition, a 16-ft.-tall penthouse is allowable. Thus, the maximum allowable height would be 291 ft.

(Continued)

TABLE 2: RELATIONSHIP OF THE PROJECT TO THE DOWNTOWN PLAN PLANNING CODE REQUIREMENTS (Continued)

/b/ The project would be 244 ft.-tall at California and Kearny Sts. plus a 22-ft. mechanical penthouse on the west, or 266 ft. at its highest point, and would step down to 138-ft.-tall including a 19-ft.-tall screen which would enclose mechanical equipment at Kearny and Sacramento Sts.; the northwest corner of the project (on Sacramento St.) would step down further to 45 ft.

/c/ The height of the base of the project would be 106 ft. above grade as measured from the center of the project frontage along California St. (the widest abutting street).

/d/ Office Affordable Housing Production Program (OAHPP) (Ordinance No. 358-85). The existing 600 California St. office building contains about 96,600 sq. ft. of office space; thus the project would add about 216,100 net new sq. ft. of office space on the site (312,700 - 96,600 = 216,100 sq. ft.)

SOURCE: Environmental Science Associates, Inc.

that include architecturally significant buildings with unused potential floor area. The combined basic FAR over the preservation (sender) and, accessory parking and freight development (receiver) sites may not, however, exceed 9:1. The building on the development site receiving TDR must comply with all limitations imposed by the Planning Code, including review under Section 309: Permit Review in C-3 Districts.

The Downtown Plan includes four categories of architecturally significant buildings: Category I (significant buildings; retain essentially intact); Category II (significant buildings; additions to height at rear may be feasible); Category III (contributory buildings outside a conservation district and of individual importance; encourage retention); and Category IV (contributory buildings in a conservation district; encourage retention; allow replacement as a contributory building). TDRs may not be transferred to sites containing significant or contributory buildings, if development would result in demolition or substantial alteration of these buildings. Neither of the buildings on the site are listed in any category. About 65,700 gross sq. ft. of TDR is proposed to be transferred to the project from as yet unidentified sites. The overall FAR for the development and contributory lots would be 9:1, or less.

The total gross sq. ft. of the project including the basement levels would be about 452,300 gross sq. ft. The building would contain about 352,000 gross sq. ft. of floor area

applicable to the FAR of the building; as calculated under the Planning Code, the FAR of the project over the 31,822-sq.-ft. development site would be about 11:1. Excluded from the FAR of the building are certain mechanical space, replacement short-term parking, loading, and ground floor uses. Personal services, retail and restaurant uses may not ground-floor (and mezzanine-level, subject to approval under Section 309) retail, restaurant, and personal service space up to 75% of ground-floor interior and open space areas, and parking equal to or less than seven percent of the gross floor area.

Development greater than the basic 9:1 FAR is allowable up to a maximum of 18:1 FAR, through transfer of development rights (TDR), from sites within the same zoning district that include architecturally significant buildings with unused potential floor area. The exceed 75% of the area of the ground-floor interior and open space areas; subject to the provisions of Section 309, a portion of these uses may be located on a mezzanine level. Under Section 102.8(b)16, floor area for accessory parking and loading space, as defined in Section 204.5, would not be counted in the FAR calculation of the building; accessory parking space may include up to seven percent of the total gross floor area of the building. In addition replacement short-term parking may be excluded (pursuant to Section 309) from the FAR if required by the City Planning Commission. Parking area in excess of the seven percent (and the replacement short-term spaces, only if not required by the Planning Commission) would require Conditional Use authorization and would apply to the FAR. The project would provide (excluding entry and exit ramps, which are exempt from FAR calculation under the Code) about 78,300 gsf of parking space (about 48 short-term and 82 long-term spaces, the remaining 102 spaces could be short and/or long-term as determined by the City Planning Commission), which would be about 39,300 gsf more than the seven percent allowable as accessory use for the project. Thus, Conditional Use authorization would be required, and this 39,300 gsf has been included in the calculation of FAR for the project.

The site is in a 250-S height and bulk district; the height limit is 250 ft. Structures up to 275 ft. are allowable under the provisions outlined for optional upper tower extensions. Section 263.9 states that the "additional height may be allowed pursuant to the provisions of Section 309 only to the extent it is determined that the upper tower volume is distributed in a way that will add significantly to the sense of the slenderness of the building and to the visual interest of the termination of the building, and that the added height will improve the appearance of the skyline when viewed from a distance, will not adversely affect light and air to adjacent properties, and will not add significant shadows

to public open spaces." A total additional 16 ft. in height is allowable for a mechanical penthouse enclosure under Section 260(b), subject to the requirements of Section 141(b), pursuant to the provisions of Section 309. At 138 ft. (including a 19 ft.-tall screen which would enclose mechanical equipment) to 266 ft., (including a 22-ft.-tall mechanical penthouse), the project would be 153-ft. lower on the north, and 25-ft. lower on the south, respectively, than the maximum allowable height of 291 ft. with penthouse. The northwest corner of the project would step down to 45-ft. or 246 ft. lower than the maximum allowable height. The S-Bulk designation controls building dimensions, floor sizes and bulk through Downtown Plan Bulk Control Zone Charts B and C. Essentially, these bulk controls require setbacks, smaller floor sizes and slimmer building profiles with increased building height. The controls require a base zone of a height not exceeding 1.25 times the width of the widest abutting street, in this case, California St. which is about 85-ft.-wide, delineated by a setback, cornice or other architectural feature. The base of the project would be about 106 ft.-tall (the height above grade as measured from the center of the project frontage along California St). The maximum permitted base height is 1.25 times the width of the widest abutting street or about 106 ft. The base of the project would include floors one through nine.

The building's lower tower, as defined by the Downtown Plan, would occupy only the southern portion of the site) would extend above the building base from the top of the ninth floor at a height of about 106 ft. (defined as the height above grade as measured from the center of the project frontage along California St.; this would be equal to a height of about 113 ft. above grade at the California/Kearny intersection) to the top of the 13th floor at a height of about 160 ft. (again, 160 ft. would be the height above grade as measured from the center of the project frontage on California St.; it would be equal to a height of about 167 ft. as measured from the California/Kearny intersection). The upper tower would extend above this to a height of about 244-ft. (as measured above grade at California/Kearny intersection), with an additional 22-ft.-tall mechanical penthouse above for a maximum height of 266 ft. With a maximum floor area and a maximum average floor area of about 13,190 sq. ft., a maximum diagonal dimension of 170 ft., and a maximum length of 155 ft., the project would be within the lower tower bulk limits specified in the Downtown Plan and City Planning Code. The northern portion of the project would be included in the base, and would not extend above it (except for the

- 19-ft.-tall wall on the top of the ninth floor of the northern portion of the tower which would screen mechanical equipment).

Diagonal and length dimensions of the project in the upper tower (170 ft. and 155 ft., respectively) would exceed the maximums of 160 ft. and 130 ft. specified in the Code, by 10 ft. and 25 ft., respectively. With a maximum average floor area of 12,740 sq. ft., and a maximum upper tower floor area of about 13,190 sq. ft., the project would exceed the maximum average floor area by about 740 sq. ft., but would be 3,805 sq. ft. less than the maximum floor area allowable for the upper tower (maximum average floor size of 12,000 sq. ft. and maximum floor area of 17,000 sq. ft.). For a 244-ft.-tall building with a lower-tower average floor size of about 12,740 sq. ft., the S-bulk controls require a volume reduction in the upper tower (above 160 ft.) of about 10%; the project would have a volume reduction of about five percent.

The project would require exceptions under Section 272(a) in accordance with Section 309, for exceedance of bulk limits and required volume reduction in the upper tower as described above.

The Planning Code requires setbacks above the building base to allow for separation of and light and air between towers (Section 132.1(c)1). Above the base, the required setback is a minimum of 15 ft. from the interior property line or the center of a public right-of-way, as the case may be, up to a height of 300 ft.; above 300 ft. the setback requirement increases linearly up to a height of 550 ft., to a maximum of 35 ft.

The 138-ft.-tall to 244-ft.-tall project would be required to be set back by about 15 ft. from the interior (western) property line above the base of the building (above a height of 106 ft.). The central portion of the western face of the 244-ft.-tall southern portion of the project would be set back above the base by about ten feet from the property line (five ft. less than required). The rest of the western face of the southern portion of the project would be set back above the base by about 15 ft. from the property line, and would meet the setback requirement. The 138-ft.-tall northern portion of the project would not require a setback from the western property line as it would be within the base height of the building. The 34-story Hartford Building abuts the southern portion of the site on the west. The Hartford Building is setback from the property line abutting the site by about seven feet (it has a double height arcade at ground-level along this side of the building); it rises without setbacks to a height of about 490 ft. Thus, the project office tower would be separated from the Hartford Building tower by between about 17 ft. and 22 ft. As the base of the building would be set back by between 10 ft. and 15 ft. (when it is not required

to be set back at all), the setbacks at the base are intended to provide the compensating recesses beyond the required setback within 50 vertical ft. of the encroachment (see discussion of exceptions below).

Exception to setback requirements is allowable, pursuant to Section 132.1(c) 2(A) and 2(B), subject to approval under Section 309. Exceptions are allowable provided there are compensating recesses beyond the required setback within 50 vertical ft. of the encroachment, which recesses are at least equal in volume to the volume of the encroachment; and/or where it can be shown that restrictions on adjacent properties make it unlikely that development will occur at a height or bulk which would, overall, impair access to light or air or the appearance of separation between buildings; and/or on lots with a frontage of less than 75 ft.

Abutting the northern portion of the site on the west is the boundary of the Chinatown CCB district under Interim Controls adopted by the Board of Supervisors, September 22, 1986. The controls limit height to 50 ft. in this district. The existing building abutting the north portion of the site, on the west, is about 30 ft. tall. The proposed building would have a height of about 45-ft. at this western corner of the Sacramento St. frontage, which is intended to respond to the 50-ft. height limit abutting that portion of the site and to the height of the existing development there.

The Downtown Plan/Planning Code requires usable indoor or outdoor open space, accessible to the public, as part of new downtown development (Section 138). The ratio of usable open space to new building space in the C-3-0 is one sq.-ft. of open space for every 50 sq. ft. of gross floor area, or about 8,020 sq. ft. for the project (open space requirement includes gsf of office, retail, lobby and other ground floor uses, service loading mechanical and storage and that amount of parking included in the FAR, or a total of 401,000 gross sq. ft. for the project). The project would include 10,400 sq. ft. of open space with 7,300 sq. ft. on the rooftop of the southern portion of the building and 3,100 in the galleria along California St. or 2,380 sq. ft. in excess of that required; the project sponsor would also contribute \$432,200 to the Downtown Park Fund per Section 139 of the City Planning Code.

The Downtown Plan and the Planning Code require that shadows on publicly accessible open space be minimized (Section 147). New buildings are to be shaped, consistent with the dictates of good design and without unduly restricting the development potential of

the site, to reduce substantial shadow impacts. Among the factors for the determination of shadow impact are: amount of area shadowed; duration of the shadow; and the importance of sunlight to the utility of the type of open space being shadowed. (See Section IV.D, pp. 93 to 104 for a discussion of shadow impacts of the project). Proposition K, the Park Shadow Ban Initiative, implemented by Section 295 of the Planning Code, requires disapproval of any project shading Recreation and Park Department property between one hour after sunrise and one hour before sunset, unless adverse effects of such shadows are found to be insignificant.

The Downtown Plan/Planning Code requires that ground-level winds may not exceed (more than 10% of the time year round between 7 am and 6 pm) 11 mph in areas of substantial pedestrian use and 7 mph in public seating areas (Section 148). The project would cause violations of the 11 mph pedestrian comfort criteria at one location along California St., continue existing violations at four locations along California St., at the A. P. Giannini Plaza and would continue existing violations of the 7 mph seating criteria at two locations in St. Mary's Square. The 7 mph seating criteria would also be exceeded at the proposed project open space on the roof of the 18-story portion of the building. The project would require an allowable exception under Section 148(a) in accordance with the provisions of Section 309, for causing a violation of the pedestrian wind comfort criteria, at one location along California St.

The Downtown Plan/Planning Code requires, and the project sponsor would provide, public art equal to one percent of construction cost.

The Downtown Plan/Planning Code requires the equivalent of three off-street loading spaces for the project. The project sponsor would comply with this requirement.

The Downtown Plan/Planning Code requires that the project sponsor provide on-site child care facilities, participate in a consortium with other sponsors or subcontract with a child care brokerage service to provide such service within two blocks of the project site, or contribute an in-lieu fee. The project would meet this requirement, in a manner to be determined.

THE MASTER PLAN

The project would respond to some objectives and policies of the Commerce and Industry Element of the Master Plan. It would respond to Objective 1, Policy 1, "to maintain and enhance a favorable business climate in the City." The employment that would be generated by the project is described in Section H, p. 129, of this chapter.

The project is intended to respond to Objective 4, Policy 2, to promote and attract economic activities of benefit to the City. The project would respond to Objective 6, to support San Francisco as a "prime location for financial, administrative, corporate, and professional activity". The project would respond to Policy 1 of this Objective, to encourage continued growth of downtown office activity.

Policy 2 of Objective 6 guides "office development to maintain a compact downtown core so as to minimize displacement of other viable uses". The project would respond to Policy 2 because it would, in part, be an infill project (in its replacement of a two-story parking garage), close to a major downtown transit center. The project would respond to Policy 4 of Objective 6 of the Commerce and Industry Element to provide "amenities for those who live, work and use the Downtown" by provision of about 7,900 sq. ft. of retail space, and enclosed open space at the ground level, and in a rooftop terrace. There is no existing retail space or open space on the site.

B. CULTURAL RESOURCES

An archaeological resources report titled, "Archival Cultural Resource Evaluation for Federal Home Loan Bank Building, 600 California Street" was prepared for the proposed site by Eleanor Mason-Ramsey, Ph.D., consulting archaeologist, and is on file with the Office of Environmental Review, Department of City Planning, 450 McAllister Street. The investigation suggests the presence of significant subsurface cultural resources on the site from the Gold Rush period on.

The earliest recorded history in the vicinity of the site dates from the Spanish-Mexican Period, when an Indian Temescal (sweathouse) existed between 1822 and 1842 on the corner of Sacramento and Montgomery St., one block east of the site. The earliest

recorded history on the site dates from the Gold Rush Period. The 1853 U.S. Coast Survey map shows five structures within the project site. The proposed project would include excavation to a depth of 30 ft. below grade which would be below the foundation level of the existing buildings (about 18 ft. below the existing basement), and which would disturb soils probably never exposed.

The buildings currently on the site date from the 1950s and 1960s.

The investigation suggests the presence of significant cultural resources on the site dating from the Gold Rush. Artifacts would also be expected to be encountered from the City Building Period (1886–1906). Excavation for the proposed project might intrude upon artifacts and might damage any resource irretrievably. Further investigation would be needed to determine means for removing the resource intact. Measures are included as part of the project to mitigate potential impacts on any cultural resources (see pp. 140 to 142).

C. URBAN DESIGN

The project would demolish two buildings, a nine-story office building (600 California St.) and a two-story (with rooftop parking) garage (551 Kearny St.), and construct a highrise similar in scale to existing newer highrises in the Financial district, and contrasting in scale with older mid- and low-rise buildings in the project vicinity (see Figures 15–20, pp. 79 to 84).

The Urban Design Element of the San Francisco Master Plan contains policies and principles which may be used to evaluate the proposed project. Table 3, pp. 85 to 91, Relationship Between Applicable Urban Design Policies of the Master Plan and the Proposed Project, compares the project to these policies.

The architectural base element would be similar in scale to the existing street wall height on Kearny St. north of Sacramento, and would relate to the base of the 580 California St. building across Kearny St. from the site. It would be larger in scale than development on Sacramento St.

The building would step down along Kearny St. from an 18-story southern tower at California St. to a nine-story northern tower at Sacramento St., and would have a

three-part vertical composition: the architectural base (ground-floor, and second- and third-floor levels); a middle shaft (floors four through 15 in the southern tower and floors four through six in the northern tower); and a top (levels 16 through 18 and a mechanical penthouse in the southern tower, and levels seven through nine and a mechanical screen in the northern tower). The project would be built to exterior property lines and to the northern portion of the west interior property line to a height of about 45 ft., stepping up to 138 ft. at Sacramento and Kearny Sts. The project would be set back by between ten feet and 15 ft. on the southern portion, from the interior property line (adjoining the adjacent Hartford Building). The shorter northern tower would be 138 ft. tall, and would extend south from Sacramento St. about 118 ft. Above about 138 ft., the southern portion of the building would continue straight up to, and including, the 18th floor (the mechanical penthouse would be set back from all but the western edges of the building).

A cornice line at the fourth level would extend horizontally along all building faces defining the architectural base. Bay windows and projecting piers clad in light-colored masonry would extend vertically from the cornice line at the base to the upper portions of the building.

The three-story architectural base element would have double-height rectangular openings to provide pedestrian access to the galleria along California St. Between the galleria openings would be single-height entrances at ground-level to the office lobby and retail areas, with recessed windows above extending vertically up to the second and third floors.

On the north and south faces, rectangular indentations (one on the south and two on the north) would begin at the cornice line at the fourth floor and extend vertically up to the upper portions of the tower. Building corners would be indented between the base cornice line and the upper portions of the building as on the north and south faces. There would be a series of bays, on the east and west faces, extending vertically to the upper portion of the towers. Decorative lanterns would be regularly spaced atop the building. Bay windows and projecting piers clad in light-colored masonry extending vertically from the base cornice line to the upper portions of the building, are intended to reflect the facades of larger, older development in the adjacent Financial district. Public open space consisting of a terrace with seating and landscaping would be located on the rooftop of the taller, southern tower. (Text continues on p. 92.)



PROJECT

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Square One Film + Video

FIGURE 15
PHOTOMONTAGE OF PROJECT WEST FROM
CALIFORNIA/LEIDESDORFF INTERSECTION

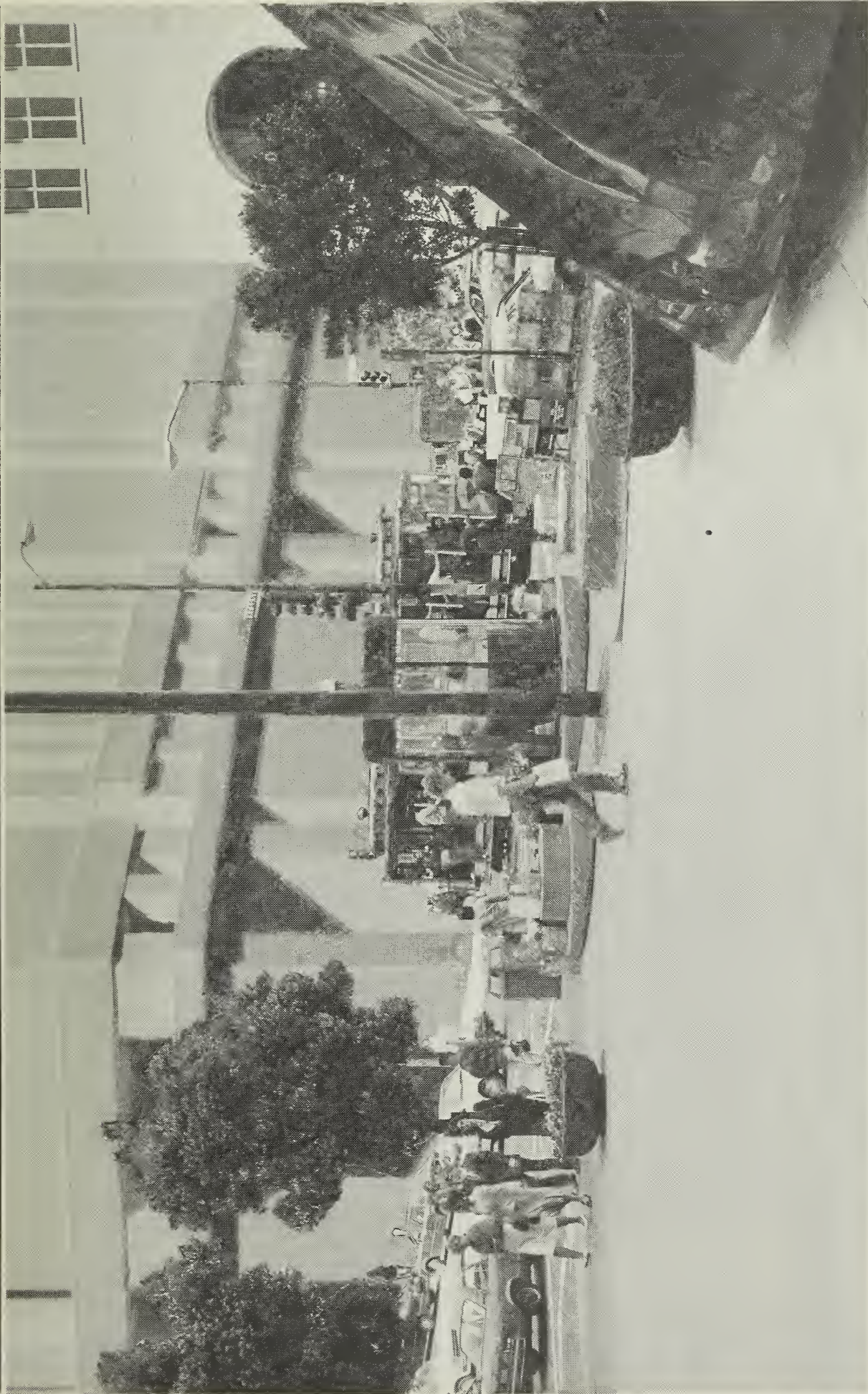


PROJECT

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Square One Film + Video

FIGURE 16
PHOTOMONTAGE OF PROJECT SOUTH FROM
KEARNY/MERCHANT INTERSECTION



PROJECT

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Square One Film + Video

FIGURE 17
PHOTOMONTAGE OF PROJECT
NORTHWEST FROM A.P. GIANNINI PLAZA

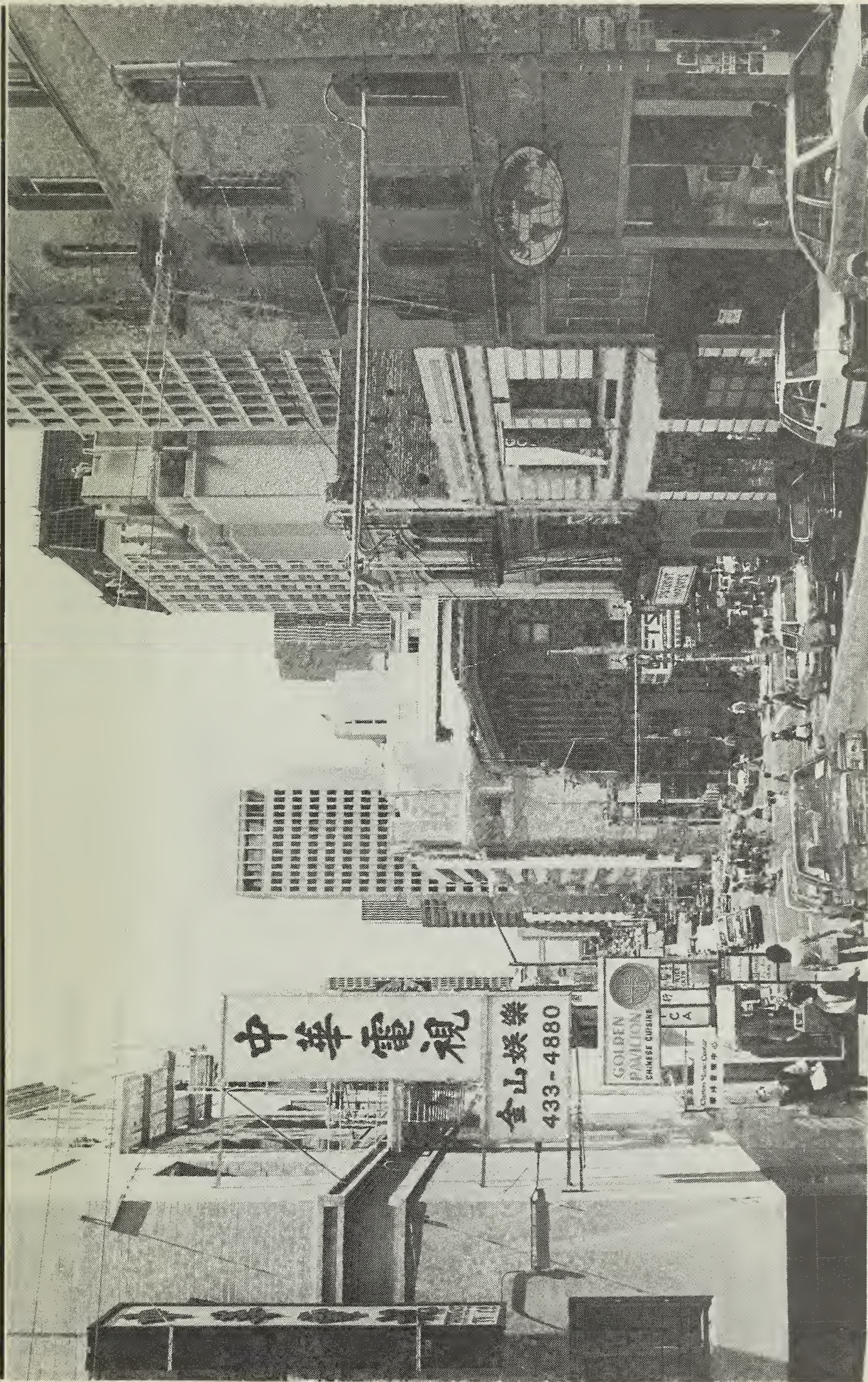


PROJECT

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Square One Film + Video

FIGURE 18
PHOTOMONTAGE OF PROJECT
WEST FROM SACRAMENTO STREET
(EAST OF SPRING STREET)



PROJECT

600 California Street
Federal Home Loan Bank of San Francisco

FIGURE 19
PHOTOMONTAGE OF SITE EASTWARD FROM
SACRAMENTO/WAVERLY INTERSECTION

SOURCE: Square One Film + Video



FIGURE 20
PHOTOMONTAGE OF PROJECT SOUTH
FROM PORTSMOUTH SQUARE

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Square One Film + Video

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT

URBAN DESIGN PLAN POLICIES	RELATIONSHIP OF PROJECT TO POLICIES
Objective 1, Policy 1 – Recognize and protect major views in the City, with particular attention to those of open space and water." (p. 10)	The project would be located along California St., a major designated view corridor. The project would not block views of Nob-Hill along this corridor. The northern site boundary is Sacramento St., which is also a major designated view corridor. The project would not obstruct any public views of the Bay or of the Ferry Building at the foot of Sacramento St. The project would partially obstruct views of Nob Hill along Sacramento St. from public open space at the podium level plazas of Four Embarcadero Center.
Objective 1, Policy 3 – "Recognize that buildings, when seen together, produce a total effect that characterizes the City and its districts." (p. 10)	The proposed building would be 45 ft.-tall on the western third of the Sacramento St. frontage and step up to 138-ft.-tall for two-thirds of this frontage to the corner of Sacramento and Kearny Sts. The 45 ft.-tall corner of the Sacramento St. frontage would be of similar scale to the 30 ft.- to 53 ft.-tall buildings along Sacramento St. and Grant Ave., on the project block west of the site and across Sacramento St. on the north. The 138 ft.-tall portion of the project frontage on Sacramento St. would be taller than low-rise development north of the site on Kearny St., and low-rise development on Sacramento St. west and north of the site. The 244-ft.-tall, southern tower would be about 220 ft. shorter than the Hartford Building (immediately west of the site), about 76 ft. shorter than the 580 California St. building (immediately east of the site), about 82 ft. shorter than the International Building (immediately south of the site), about 571 ft. shorter than the Bank of America Headquarters Building (diagonally across California and Kearny Sts. from the site), and would be taller than mid and low rises south on Kearny St. toward Market St. The project would help define the western edge of the Financial district and its edge along Sacramento St., defining the high-rise character of the Financial district at its boundaries with

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

URBAN DESIGN PLAN POLICIES	RELATIONSHIP OF PROJECT TO POLICIES
Objective 1, Policy 3 (continued)	Chinatown to the west and north. The project would step down from the Financial district toward Chinatown.
Objective 1, Policy 6 - "Make centers of activity more prominent through design of street features and by other means." (p. 12)	The project would increase the visual prominence of the site and pedestrian interest compared to the existing unembellished office building and concrete parking garage. It would include ground-level retail space, and galleria open to California St. visible to passing pedestrians and drivers. Art work would be included in the project, in a manner to be determined.
Objective 2, Policy 4 - "Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development." (p. 25)	The buildings on the site are not landmarks, do not have significant or contributory status under the Downtown Plan, and were not rated in the City's 1976 or the Heritage architectural surveys. Through the use of TDR, the project would preserve a significant or contributory building (or buildings) elsewhere in the C-3-O district.
Objective 2, Policy 6 - "Respect the character of older development nearby in the design of new buildings." (p. 25)	The project would differ in form and scale from buildings north and west (on its northern portion) and would be similar to buildings south, east, and west (on its southern portion). The height of the architectural base and the 45 ft.-tall westernmost frontage along Sacramento St. are intended to complement the height of older development along Sacramento St. and Grant Ave. on the project block, and the base of the 580 California St. building. The project would be faced in light-colored masonry and stone, intended to complement building materials of adjacent structures.
Objective 3, Policy 1 - "Promote harmony in the visual relationships and transitions between new and older buildings." (p. 36)	The project would be a transition in scale among surrounding buildings, stepping down from south to north along Kearny St. and from east to west along Sacramento St. It would be similar to, but shorter than, buildings south and east such as the 580 California St. Building, the International Building, and the Bank of America Building;

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

URBAN DESIGN PLAN POLICIES	RELATIONSHIP OF PROJECT TO POLICIES
Objective 3, Policy 1 (continued)	<p>it would be different from, and taller than buildings north and west in Chinatown which are generally two to four stories tall (except for the westernmost Sacramento St. frontage of the project which would be three stories tall). Vertical bays, rectangular indentations and articulated building corners to emphasize the slenderness of the project building, and a horizontal belt course defining the project base, are intended to reduce the apparent bulk of the building and relate it to the 580 California St. building and to older, low-rise development across Sacramento St. north of the site.</p>
Objective 3, Policy 2 - "Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance." (p. 36)	<p>The project would be similar in scale to nearby newer buildings. The building would be faced in light-colored masonry and stone, intended to complement building materials of adjacent structures such as 580 California St. and older development across Sacramento St. north of the site.</p>
Objective 3, Policy 3 - "Promote efforts to achieve high quality of design for buildings to be constructed at prominent locations." (p. 36)	<p>The building would include architectural features, such as the projecting cornice line at the architectural base, and the double-height arch openings at building corners and the lobby entrance intended to complement adjacent development including 580 California St. and older buildings on Sacramento St. north of the site, and to be in character with existing high-rise development in the C-3 District.</p>
Objective 3, Policy 4 - "Promote building forms that will respect and improve the integrity of open spaces and other public areas." (p. 36)	<p>The project would include a private, publicly accessible galleria open to California St. (connecting to the existing Hartford Building Plaza) and public open space on the roof of the southern tower.</p>
Objective 3, Policy 5 - "Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development." (p. 36)	<p>The project would be taller and more visible than existing structures along the south side of Sacramento Sts. adjacent to the site on the west, (except for the northwestern</p>

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

URBAN DESIGN PLAN POLICIES

Objective 3, Policy 5 (continued)

Objective 3, Policy 6 - "Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction." (p. 37)

RELATIONSHIP OF PROJECT TO POLICIES

corner of the project which would be three stories tall) and two-to four-story buildings north across Sacramento St. and in Chinatown to the north. At nine to 18 stories, it would be lower than newer high-rise buildings in the immediate vicinity on the west, east and south, such as the 34-story Hartford Building on the west, the 23-story 580 California St. Building to the east, the 22-story International Building to the south, and the 52-story Bank of America Headquarters Building to the southeast. It would be taller than low-rise buildings further north and south on Kearny St.

The project would be greater in bulk than most of the low-rise older buildings in the site vicinity and similar in bulk to some newer development including the 580 California St. and International buildings; it would be of lesser bulk than the Bank of America and Hartford buildings. The project would exceed Downtown Plan/Planning Code maximum length, maximum diagonal, and maximum average floor limits in the upper tower. The upper tower would have a volume reduction of about five percent (a 10% reduction would be required). Code exceptions would be required for upper tower bulk (except maximum floor size) and volume reduction. Vertical bays and rectangular indentations on the building's faces are intended to emphasize a slender project appearance. The proposed building would step down from the taller southern tower to the lower northern tower; thus, the building would provide a visual transition between high-rise buildings adjacent to the California/Kearny intersection and mid-rise buildings at the Sacramento/Kearny intersection. The northern tower would step down westward along Sacramento St. from Kearny St., intended to provide a visual transition between high-rise buildings along Sacramento St. east of Kearny St., and low- and mid-rise buildings west along

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

URBAN DESIGN PLAN POLICIES

Objective 3, Policy 6 (continued)

DOWNTOWN PLAN - URBAN
FORM CHAPTER - POLICIES

"Relate the height of buildings to important attributes of the city pattern and to the height and character of existing and proposed development." (p. 84)

RELATIONSHIP OF PROJECT TO POLICIES

Sacramento St. This proposed transition could result in a building that would decrease in height, uphill, rather than following the hill's topography (that is, increasing in height uphill).

The proposed project would be at the north boundary of the Financial district, where it meets Chinatown, and about one-half block from the Financial district border with Chinatown to the west. The project would be of intermediate height in its context and constructed in three steps. It would be shorter than buildings immediately south, west and east along California St., and would be taller than buildings immediately west and north along Sacramento St. The proposed building would be 45 ft.-tall at the westernmost third of the Sacramento St. frontage and step up to 138 ft.-tall for two-thirds of the frontage to the corner of Sacramento and Kearny Sts. The 45 ft.-tall corner of the Sacramento St. frontage would be similar to the 30 ft.- to 53 ft.-tall buildings along Sacramento St. and Grant Ave., on the project block west of the site. At the 138 ft.-tall frontage on Sacramento St. the project would be taller than low-rise development north of the site on Kearny St. and low-rise development on Sacramento St. west and north of the site. The 244-ft.-tall southern portion of the building would be taller than the 40 ft.-tall St. Mary's Church (one-half block west of the site) and about 220 ft. shorter than the Hartford Building (immediately west of the site), about 76 ft. shorter than the new 580 California St. Building (immediately east of the site), about 82 ft. shorter than the International Building (immediately south of the site), and about 571 ft. shorter than the Bank of

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

DOWNTOWN PLAN POLICIES, continued	RELATIONSHIP OF PROJECT TO POLICIES
"Relate the height"	America Headquarters Building (diagonally across California and Kearny Sts. from the site). The project would be of intermediate height compared with the 60 ft.-to 300-ft. tall buildings along California and Sacramento Sts. east of the site.
"Foster sculpturing of building form, less overpowering buildings and more interesting building tops." (p.84)	The project would feature vertical bay windows, rectangular indentations and articulated building corners above the architectural base (intended to reduce the appearance of bulk). The project would include two towers with a step down from California/Kearny to Sacramento/Kearny, and from Kearny along Sacramento to the northwest corner of the project. The articulated building corners would terminate in decorative architectural features of the top of the towers.
"Maintain separation between buildings to preserve light and air and prevent excessive bulk." (p. 96)	The project would be set back about five ft. less than the required 15 ft. setback above the base on the west where the southern portion of the building would abut the interior lot line. The separation between the project and the Hartford Building tower would be 17 to 22 ft. The north tower would not be set back from the interior property line. The project sponsor would seek an exception to the Separation of Towers requirement under Section 132.1 (c)(2A-B)) of the Planning Code.
"Assure that new buildings contribute to the visual unity of the City." (p. 105)	The building would be faced in light colored material and would not use mirrored glass. The project would incorporate a defined architectural base element of similar height to that of nearby older development along Sacramento St. north of the site, and along Sacramento St. and Grant Ave. west of the site. Architectural features and decorative elements of the project are intended to relate to older development north and west and to the 580 California St. Building east across Kearny St.

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

DOWNTOWN PLAN POLICIES, continued

"Encourage more variation in building facades and greater harmony with older buildings through use of architectural embellishments and bay or recessed windows." (p. 105)

"Conserve the traditional street to building relationship that characterizes downtown San Francisco." (p. 106)

"Provide setbacks above a building base to maintain the continuity of the predominant streetwalls along the street." (p. 106)

"Maintain and enhance the traditional downtown street pattern of projecting cornices on smaller buildings and projecting belt courses on taller buildings." (p. 107)

"Use design and materials and include activities at the ground floor to create pedestrian interest." (p. 107)

RELATIONSHIP OF PROJECT TO POLICIES

The project would include vertical bays on the east and west faces, and rectangular indentations on all faces, with articulated building corners. The project would have recessed windows and architectural embellishments; decorative lanterns would be regularly spaced atop the building.

The building's architectural base would be built to lot lines at California, Kearny, and Sacramento Sts. and would define a streetwall height relating to older development nearby on Sacramento St. and Grant Ave. and the base of the 580 California St. Building. The project tower would be of comparable height to existing development on the north side of California St., east of the adjacent Hartford Building, and along the south side of California St., immediately south of the site.

The proposed step down from the south tower to the north tower of the project would maintain the continuity of existing streetwalls surrounding the site. The project proposes no setbacks from Sacramento St.; it would, however, step down from south to north along Kearny St. and from east to west along Sacramento St.

The building would incorporate a cornice line above the architectural base.

A galleria would be located along California St. connecting to the Hartford Building plaza. Retail space would be located and accessible on the ground floor along California, Kearny and Sacramento Sts. Stone detailing and a projecting cornice line and double-height arch openings at the architectural base are intended to give the project pedestrian scale.

SOURCE: Urban Design Element, San Francisco Comprehensive Plan, 1971; Downtown Plan, October 1985; Environmental Science Associates, Inc.

- Along Sacramento St. the proposed building would be 45 ft.-tall along the western third of the frontage and would step-up to 138 ft.-tall for the remaining two-thirds of the frontage to the corner of Sacramento and Kearny Sts. The 45 ft.-tall corner of the Sacramento St. frontage would be similar in height to existing structures on the project block, such as the 40-ft.-tall St. Mary's Church at California St. and Grant Ave. and the two- to four-story, 30- to 53-ft.-tall buildings along Grant Ave. and Sacramento St. west and north of the site. The 138 ft.-tall portion of the frontage would be taller and more visible than most existing structures on the project block which range in height from 26 ft. to 53 ft; it would be from almost three to almost five times taller than existing buildings on Sacramento St. north of the site. The 244 ft.-tall southern portion of the building would be 220 ft. shorter than the 34-story, 465-ft.-tall Hartford Building adjacent to the site's western property line, and would be taller than St. Mary's and other Chinatown development on the west. It would be shorter than nearby, newer development, such as the 320-ft.-tall 580 California St. Building across Kearny St., east of the site, the 815-ft.-tall Bank of America Headquarters Building diagonally across California and Kearny Sts. from the site and the 326-ft.-tall International Building across California St., south of the site.

The project would be visible from Portsmouth Square, about two blocks to the north, and would partially block views of the International Building and Bank of America Headquarters Building (see Figures 15-20, pp. 79 to 84). The project would partially block views of Nob Hill along Sacramento St. including views from outdoor open space on the podium levels of Four Embarcadero Center. It would block views of the International Building from Telegraph Hill. The project would block views of the Bay east from lower floors of the Hartford Building; it would block views of Telegraph Hill from windows on the northern side of the International Building; and it would block views northwest from lower floors of the Bank of America Headquarters Building and lower floors of the 580 California St. Building. The taller, southern tower of the project would be partially visible from Market St. at Kearny/Third St. and from Powell St. at California St. and at Sacramento St. The project would be visible from the northern edge of St. Mary's Square, one-half block south of the site. The project would not block views of the Bay along California St. and Sacramento St. from Nob Hill. The project would not be visible from long-range view-points such as Twin Peaks, Potrero Hill, the Bay Bridge/Treasure Island, because of existing, intervening high-rise buildings. The project would be visible as part of the view of the Financial district, looking southeast from Russian Hill.

The project would change views for people walking or driving toward the site, particularly views toward the site from one to three blocks north or south along Kearny St. The taller southern portion of the project would be of similar mass to the 580 California and International buildings, and would add to the massing of lower highrises at this intersection, surrounded by the larger Bank of America and Hartford buildings. The proposed project would add to the visual effect of highrise construction in the project area.

D. SHADOW AND WIND

SHADOW

Shadow patterns for existing and approved buildings in the project area (including existing buildings on the site) and the project are shown for 10 a.m., noon and 3 p.m. for the four seasons: during winter and summer solstices when the sun is at its lowest and highest, and during the spring and fall equinoxes when the sun is at its midpoint (see Figures 21 to 24, pp. 95 to 98). Conditions from July through November mirror the conditions from January through May (using solar time). The analysis includes shadows cast on streets, sidewalks, pedestrian areas, and open space in the area potentially affected by the proposed project. A shadow outline of the project as though cast on the ground, without intervening buildings, is shown to illustrate the scale of the project in relation to the structures that would surround it. The diagrams in Figures 21 to 24 show existing and approved building shadows and net new shadow due to the project. Additional shadow diagrams were drawn at various times during the afternoon hours of all four seasons to determine the effects of existing buildings on the rooftop terrace of the proposed project. See discussion of open space (below) and Proposition K (pp. 99 to 104). (These diagrams are on file at the Department of City Planning, 450 McAllister St., San Francisco.)

Open spaces in the project vicinity consist of the Bank of America's A.P. Giannini Plaza (privately owned, publicly accessible) located diagonally across the California and Kearny Sts. intersection about 110 ft. southeast of the site; the Hartford Building Plaza, which is covered by the upper floors of the Hartford Building and open on the sides, (privately owned, publicly accessible) immediately west of the site; a plaza on the fourth floor of the International Building (privately owned, not publicly accessible, about 100 ft.

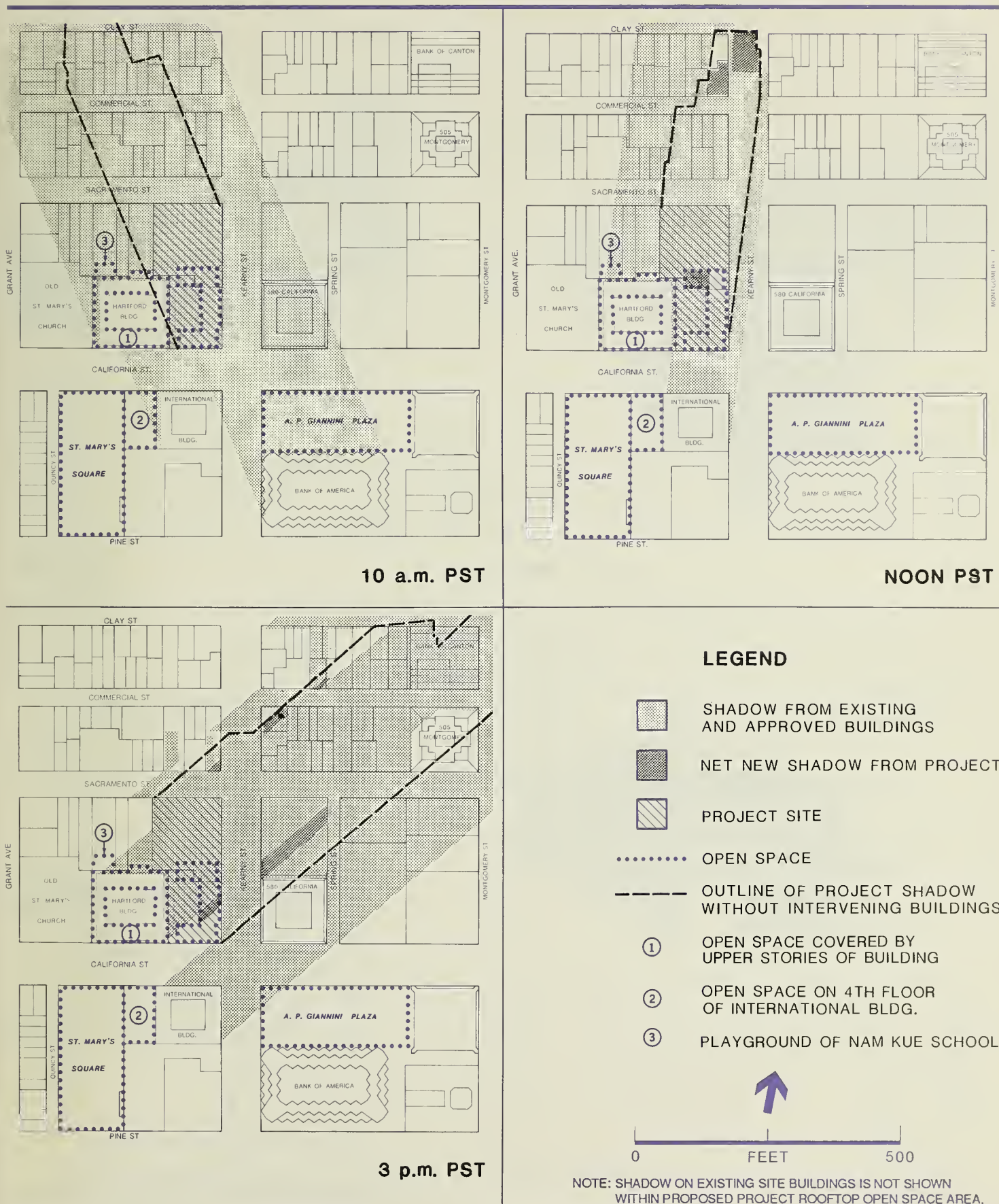
southeast of the site); a playground located behind the Nam Kue School adjacent to the Hartford Building about 70 ft. west of the site (privately owned, not publicly accessible); St. Mary's Square, about 125 ft. southwest of the site; the Chinese Playground, about 500 ft. northwest of the project; and Portsmouth Square, about 400 ft. north of the site (the latter three are city parks). St. Mary's Square, Portsmouth Square and the Chinese Playground are under the jurisdiction of the Recreation and Park Department, and are subject to Proposition K, the Park Shadow Ban initiative. The project would provide about 10,400 sq. ft. of new open space, 7,300 sq. ft. in a rooftop terrace on the 18-story south tower of the project and in the 3,100 sq. ft. galleria along California St. Project shadow effects on affected open spaces are discussed below.

December 21 (PST)

At 10 a.m. Pacific Standard Time (PST) on December 21, (see Figure 21, p. 95), the proposed project would add no new shadow to the project area. At noon, the proposed project would add a new shadow about 50 ft. wide and 60 ft. long to Kearny St. between Commercial and Clay Sts. and about 1,900 sq. ft. (about 26%) of new shadow in the northeastern area of the proposed project rooftop open space. At 3 p.m., the project would add no new shadow to any streets or sidewalks; new shade from the project would fall on rooftops to the north and east, and to about a 1,200 sq. ft. area (about 16%) in the central and southern parts of the proposed project rooftop open space.

March 21 (PST)

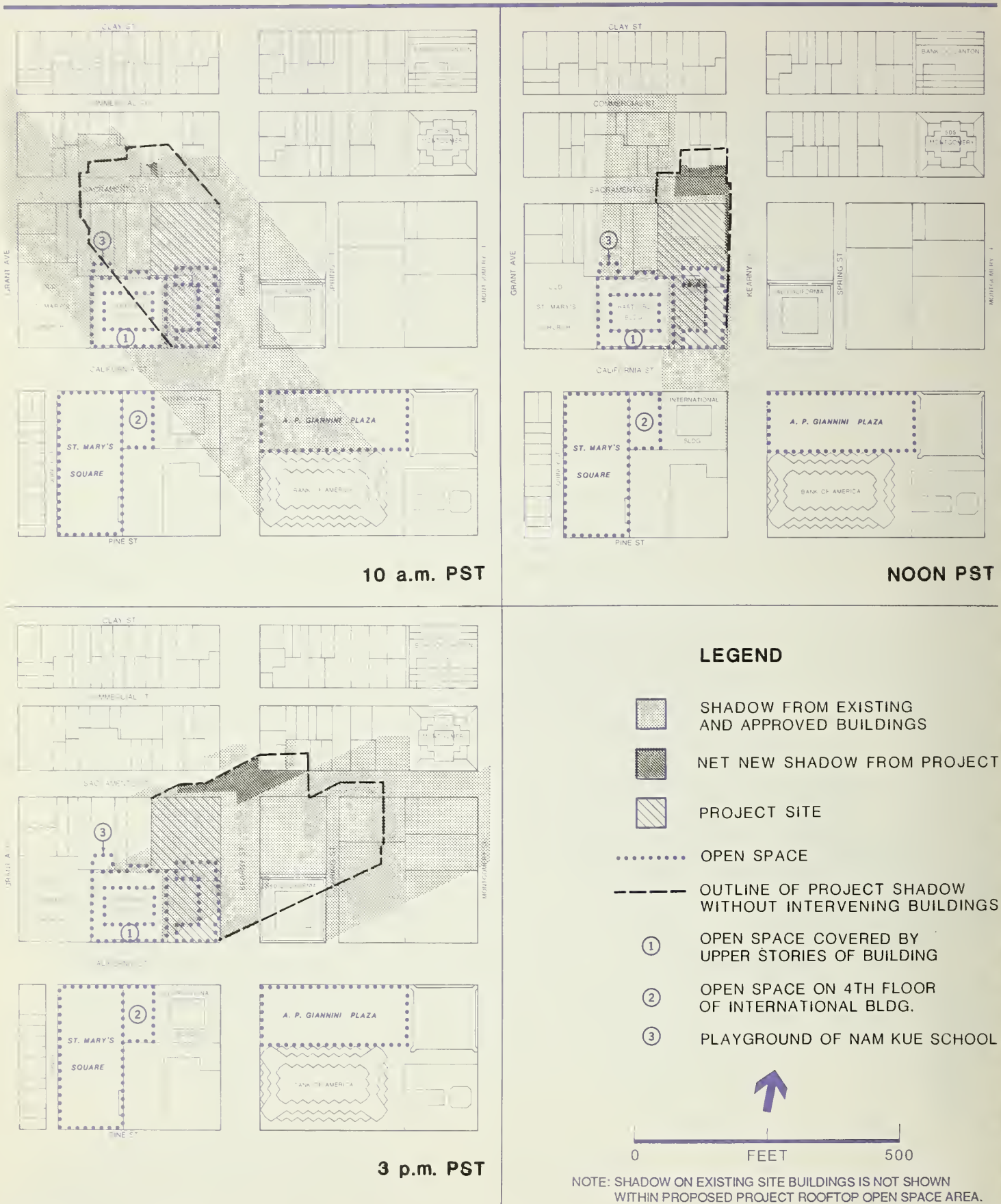
At 10 a.m. PST on March 21, (see Figure 22, p. 96), the proposed project would add a new triangle of shadow (about 20 ft. by 30 ft. by 30 ft.) to the rooftops of buildings on Sacramento St. across from the project site. At noon, the building would add new shadow about 100 ft. long to Sacramento St., to about a 1,200 sq. ft. area in the northwestern part of the proposed project rooftop open space (about 16%) and to rooftops of buildings on Sacramento St. directly across from the project site. At 3 p.m., the building would add new shadow to most of the Sacramento and Kearny St. intersection and to the northern sidewalk of Sacramento St. on the east and west side of the intersection.



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

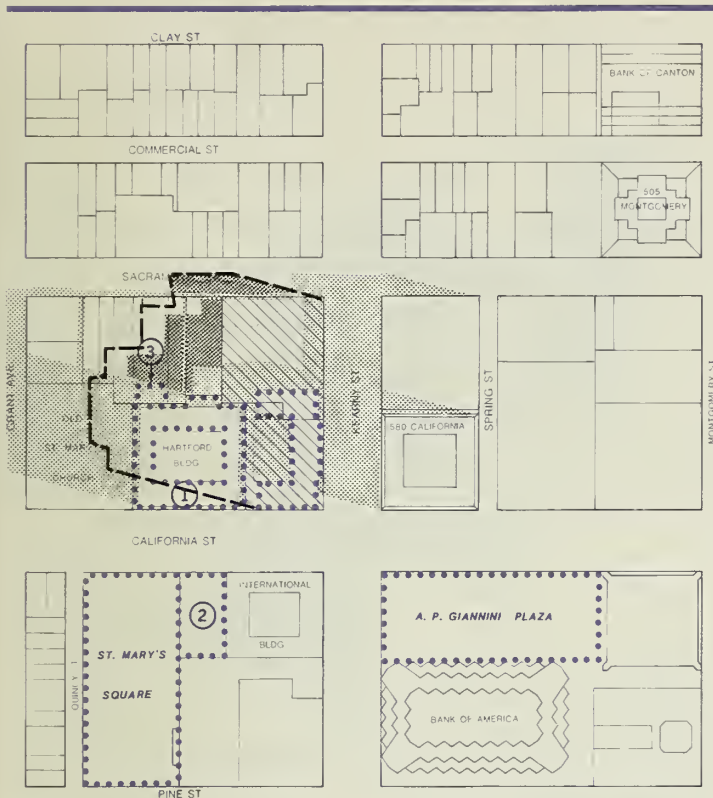
FIGURE 21
SHADOW PATTERNS –
DECEMBER 21



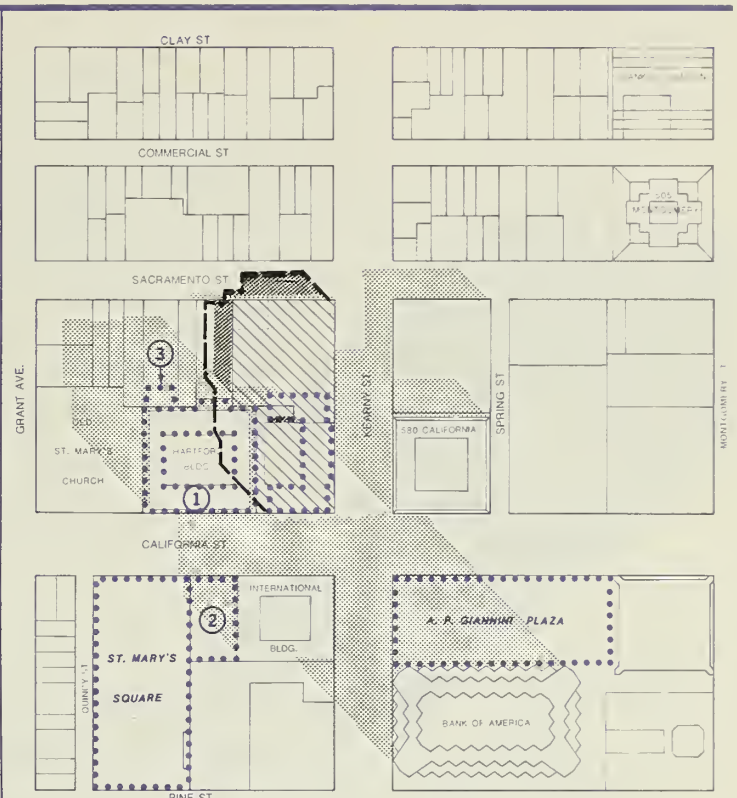
600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

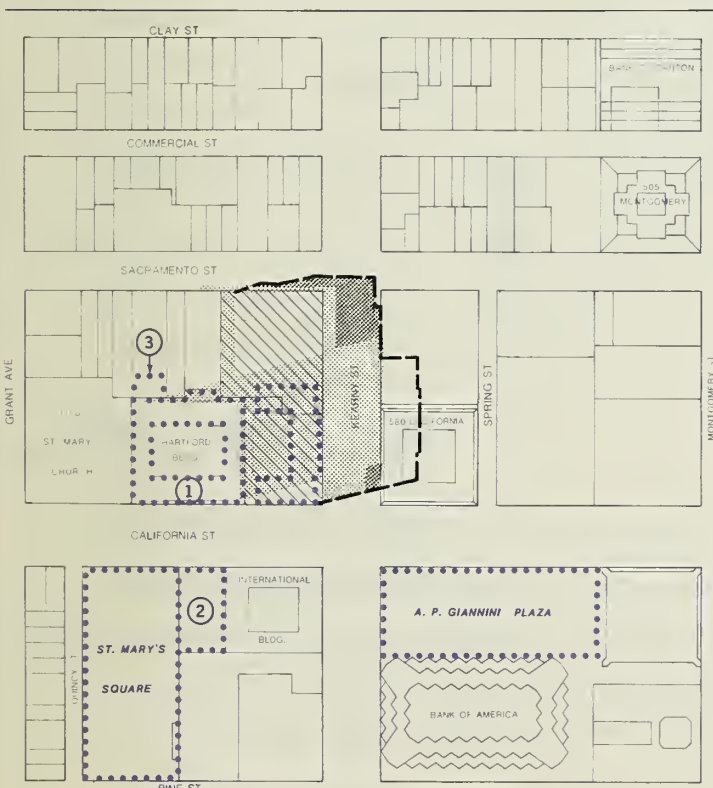
FIGURE 22
SHADOW PATTERNS -
MARCH 21



10 a.m. PDT



NOON PDT



3 p.m. PDT

LEGEND

- SHADOW FROM EXISTING AND APPROVED BUILDINGS
- NET NEW SHADOW FROM PROJECT
- PROJECT SITE
- OPEN SPACE
- OUTLINE OF PROJECT SHADOW WITHOUT INTERVENING BUILDINGS
- ① OPEN SPACE COVERED BY UPPER STORIES OF BUILDING
- ② OPEN SPACE ON 4TH FLOOR OF INTERNATIONAL BLDG.
- ③ PLAYGROUND OF NAM KUE SCHOOL

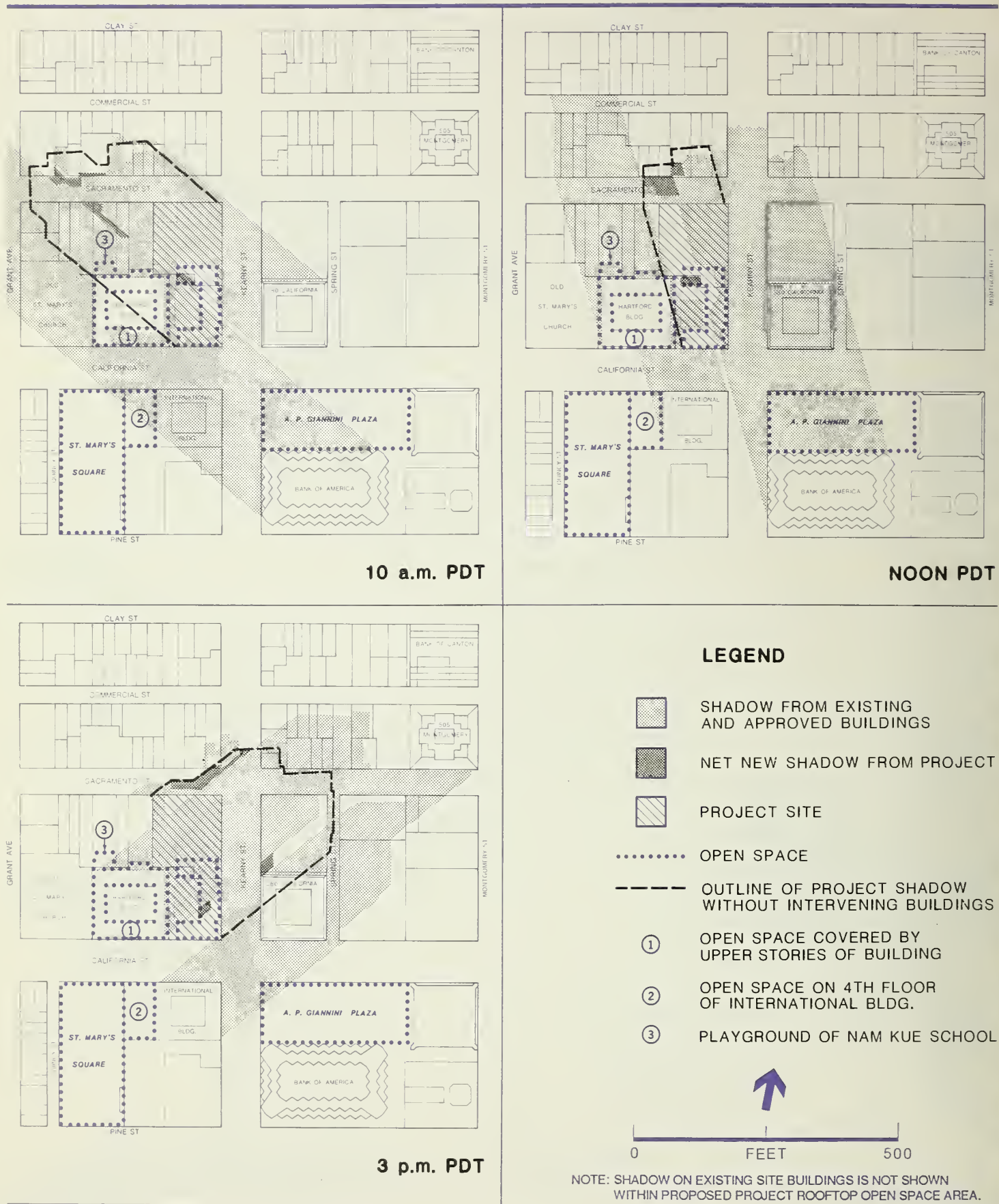


NOTE: SHADOW ON EXISTING SITE BUILDINGS IS NOT SHOWN WITHIN PROPOSED PROJECT ROOFTOP OPEN SPACE AREA.

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 23
SHADOW PATTERNS -
JUNE 21



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 24
SHADOW PATTERNS -
SEPTEMBER 21

June 21 (PDT)

At 10 a.m. Pacific Daylight Time (PDT) and noon, to a lesser degree, on June 21 (see Figure 23, p. 97) , the project would add new shadow to the southern half of Sacramento St., from Kearny St. west on Sacramento about halfway to Grant Ave., and on rooftops of buildings immediately west of the site. At 3 p.m., the project would add new shadow to the south part of the Kearny and Sacramento St. intersection, and on the eastern sidewalk of Kearny St. about one-quarter of the block between Sacramento and California Sts., and an approximately 25 ft. long by 30 ft. wide rectangular area of Kearny St. and sidewalk, northeast of the Kearny and California St. intersection.

September 21 (PDT)

At 10 a.m. PDT on September 21 (see Figure 24, p. 98), the project would add new shadow to an approximately 70 ft. wide by 20 ft. long area of Sacramento St. and its northern sidewalk (and to rooftops there, and within the project block) and to about 950 sq. ft. area in the northwestern part of the proposed project rooftop open space (about 13%). At noon, the project would add new shadow across from the project site, to a portion of the northern side of Sacramento St. and its adjacent sidewalk, and rooftops in that direction and to about 950 sq. ft. area in the northwestern part of the proposed project rooftop open space (about 13%). At 3 p.m., the project would shade most of Sacramento St. at Kearny and a portion of its northern sidewalk and building rooftops, across from the project site, a narrow strip of shadow across Kearny St., and a portion of the rooftop of buildings across Kearny St., east of the site and to an approximately 15 ft. wide by 25 ft. long area in the central part of the proposed project rooftop open space (about 5%).

Proposition K

In June 1984, the voters of the City and County of San Francisco approved Proposition K, the Park Shadow Ban initiative ordinance prohibiting the issuance of building permits for structures that would shade property under the jurisdiction of, or designated to be acquired by, the Recreation and Park Commission unless the City Planning Commission determines that such shade would have an insignificant adverse impact on the use of such property.

Figure 25, p. 101 shows the maximum extent of project shadow on potentially affected property as though cast on the ground without existing intervening buildings. Due to intervening buildings, the project would add no new shadows to any property under the jurisdiction of, or designated to be acquired by, the Recreation and Park Commission, during the hours specified by Proposition K (one hour after sunrise to one hour before sunset at any time of the year). That is, although the project shadow trace (shadow fan) shows potentially shaded areas on Proposition K regulated properties, the project itself would not shade these due to the existing development configuration. Detailed shadow diagrams showing the maximum extent of project shadow toward potentially affected property are on file and available for public review at the Department of City Planning, 450 McAllister St.

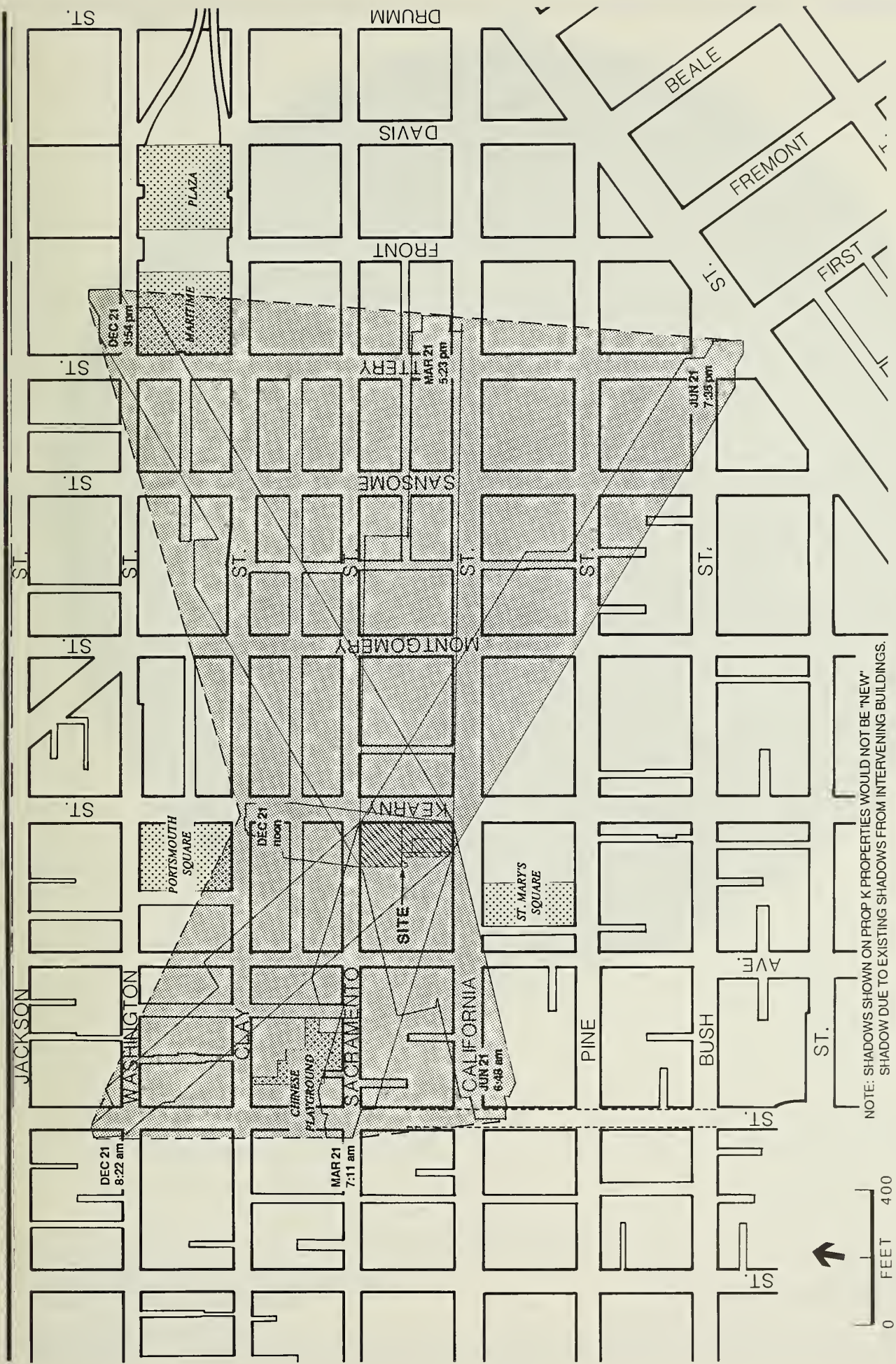
Open Space

The shadow studies show that the project would add no new shadow to any open space areas in the project vicinity.

Sun Path Analysis

An analysis of sunlight duration for two locations are shown in Figures 26 and 27, pp. 102 and 103; one location is in the A.P. Giannini Plaza and one on Sacramento St. between Kearny and Grant Sts. A diagram of the sun's yearly path was superimposed on fish-eye lens photographs of the sky. These diagrams accurately depict the time of day (expressed as local solar time, which is close to pacific Standard Time; during the time that Pacific Daylight Time is in effect, the sun location would be comparable to about one hour earlier than shown), throughout the year, that direct sunlight would reach each location, but creates an exaggerated visual image due to the distortion of the fish-eye lens. This technique differs from the shadow pattern analysis in that it does not predict the extent of shadow but rather the duration of sunlight and shade at one specific location.

Horizontal lines indicate a specific date in the year (June 21, May 21/July 21 etc.), vertical lines indicate time of day. At the times of day and periods of the year, indicated by the horizontal and vertical lines, that the project outline falls on the diagram, the project would cast shadows at the point where the photograph was taken. Thus on Figure 26, in the A. P. Giannini Plaza for example, the project outline would fall within an area of the horizontal lines which is already covered by existing buildings, indicating that at the point where the photograph was taken the project would cast no new shadows. On

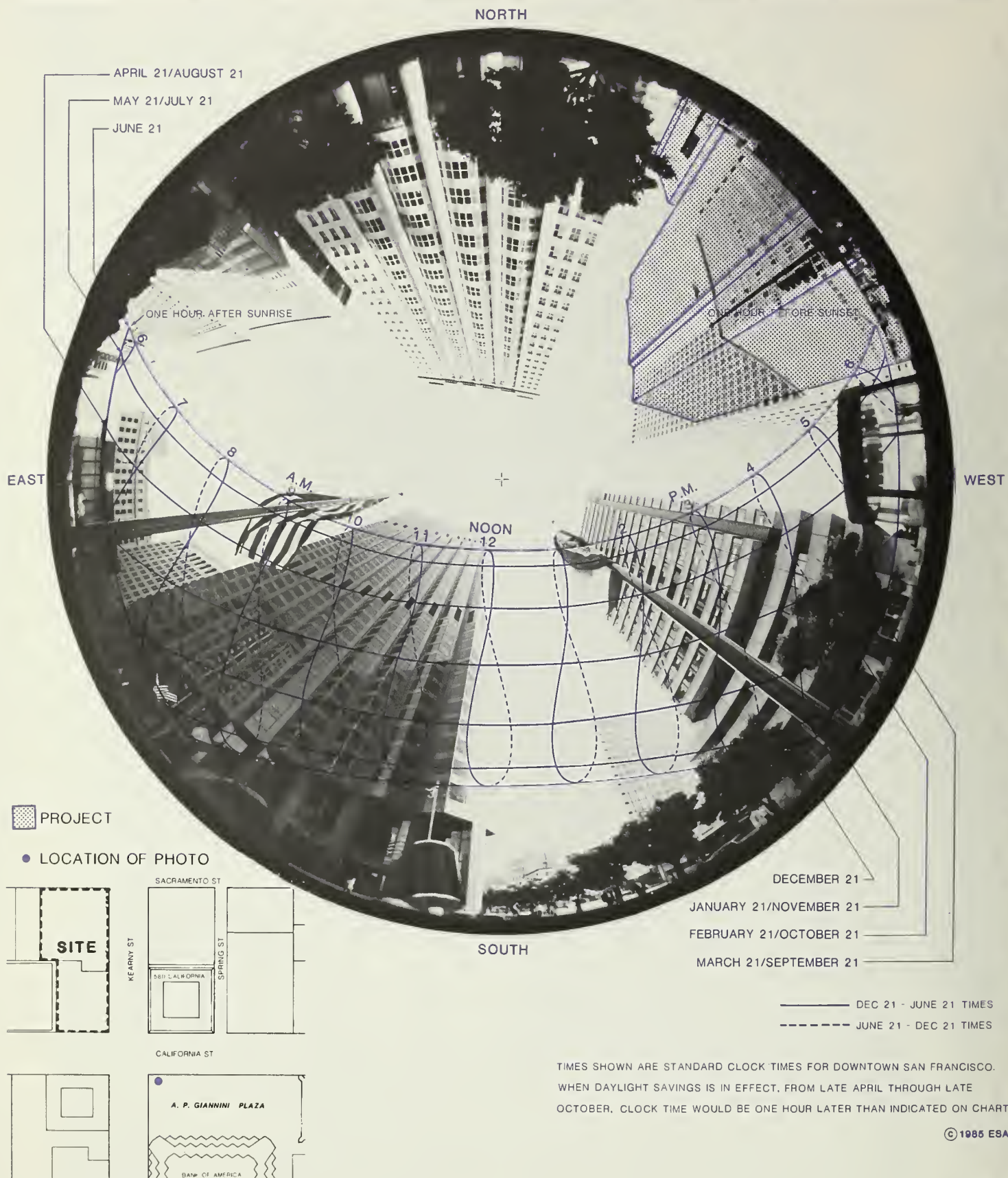


NOTE: SHADOWS SHOWN ON PROP K PROPERTIES WOULD NOT BE "NEW" SHADOW DUE TO EXISTING SHADOWS FROM INTERVENING BUILDINGS.

600 California Street
 Federal Home Loan Bank of San Francisco

FIGURE 25
 YEAR-ROUND SHADOW TRACE

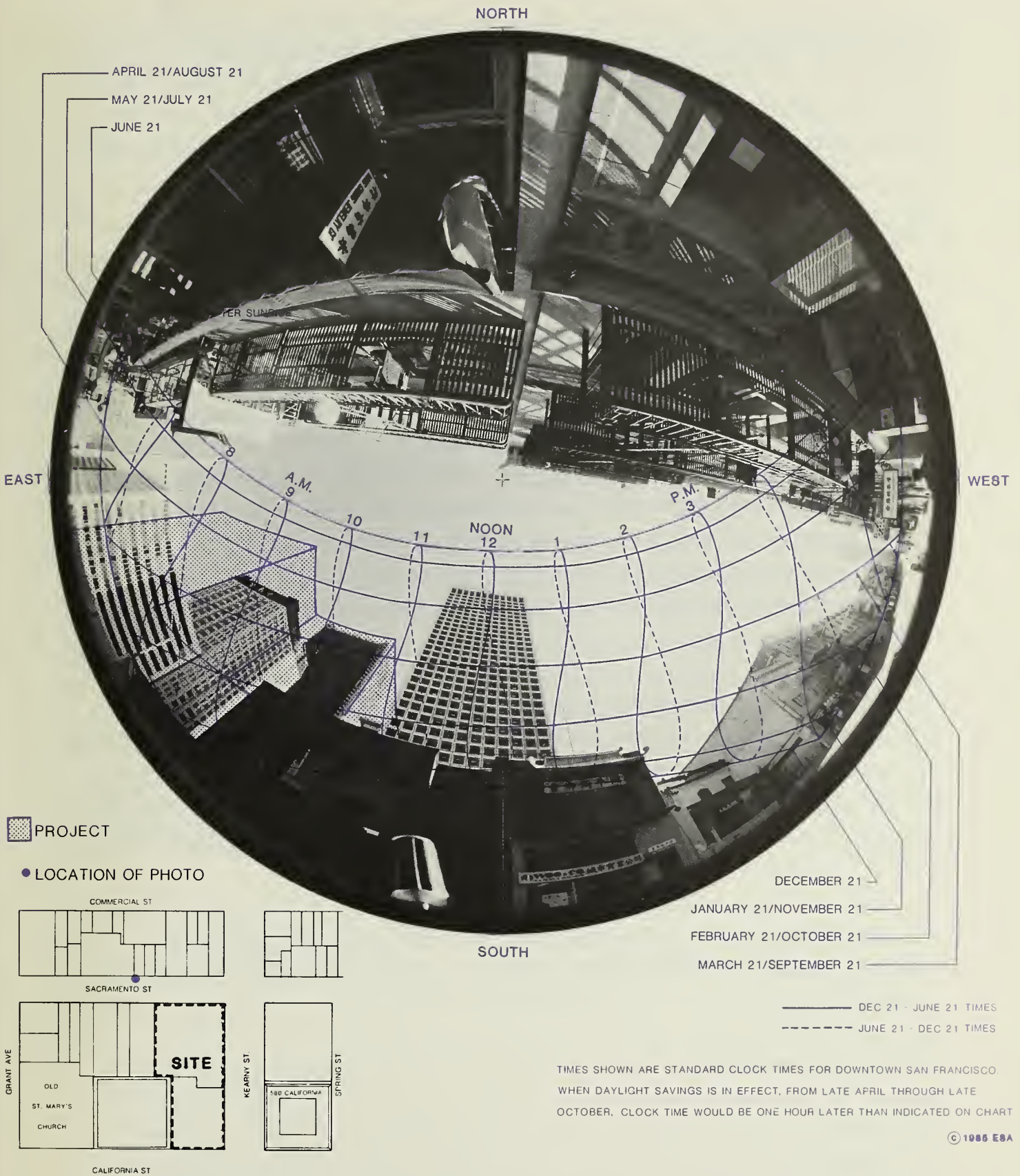
SOURCE: ESA



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 26
SUN PATH ANALYSIS ON
A.P. GIANNINI PLAZA



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 27
SUN PATH ANALYSIS ON
NORTH SIDE OF SACRAMENTO ST.

Figure 27, taken on the north side of Sacramento St., the project outline does not cover the first or second horizontal lines, indicating that at the point where the photograph was taken, the project would cast no new shadow on June 21st or May 21/July 21; the project outline covers the third horizontal line (April 21/August 21) from about 7:50 a.m. to about 11 a.m.

WIND/1/

Prevailing winds in San Francisco are from the northwest, west-northwest, west and west-southwest. Wind tunnel measurements were made at 22 surface locations near the project site for three of the prevailing wind directions using a scale model of the site, the project and vicinity. The study included separate tests of northwest, west-northwest, and west winds under existing conditions and future conditions with the project and three alternatives in place. The tests excluded west-southwest winds, which previous wind tunnel tests have shown contribute little to pedestrian level winds in Downtown areas north of Market St./2/ The alternatives include; an alternative with a 9:1 FAR; an alternative requiring no exception to the Planning Code separation of towers or bulk requirements; and an alternative with a 50-ft. height along Sacramento St. with a 60-ft. setback above.

Wind test data were combined with records to predict the wind speed that would be exceeded 10% of the time at each test location. The predicted winds were then compared to the comfort and hazard criteria in the Planning Code, established in the Downtown Plan (See Appendix B, p. A-42, for a summary of the full wind analysis). Throughout the following discussion, the wind speeds reported refer to the equivalent wind speeds that would be exceeded 10% of the time./3/

The locations of the measurement points and the results of the wind tunnel study, including compliance with the comfort criteria are summarized in Figures B-1 and B-2, pp. A-46 and A-47.

Wind speeds in the existing setting are from seven to 18 mph at the 22 locations tested. The comfort criterion for pedestrians is violated at nine of the 19 locations at which it applies and the comfort criterion for seating area is violated at all three locations at which it applies, as described immediately following. Strong winds, with speeds from 11 mph to 16 mph, occur along California St. between Quincy St. and Spring St., in A.P.

Giannini Plaza, and in St. Mary's Square; winds in those three areas exceed the pedestrian comfort criterion in nine locations and exceed the public seating comfort criterion in two locations.

Winds along Sacramento St. and mid-block on Kearny St., between California and Sacramento Sts., range from seven mph to 11 mph; winds there meet the pedestrian comfort criterion at all nine locations. The strongest existing wind, 18 mph, occurs on the rooftop of the existing 600 California St. building, where the wind exceeds the public seating comfort criterion and also violates the hazard criterion because that wind exceeds 26 mph for more than one hour annually.

The project would result in winds ranging from six to 16 mph. The project would cause winds to decrease at six of the 22 locations, be unchanged at 11 locations, and increase at five locations. The pedestrian comfort criterion would continue to be violated at nine locations, the seating area criterion would continue to be violated at three locations and the project would cause one new exceedance of the pedestrian comfort criterion. Along California St., winds would increase at one location and decrease at two locations; however, winds at the one location on California St. (in front of the Hartford Building) that now meets the 11 mph criterion would exceed that criterion. Winds in A.P. Giannini Plaza would be unchanged, and would continue to exceed the 11 mph criterion. Winds in St. Mary's Square would be unchanged at 12 mph at one location and decrease from 12 to 11 mph in the other; both locations would continue to exceed the 7 mph comfort criterion. Winds along Sacramento and Kearny Sts. would be increased at four locations, unchanged at three locations and decreased at two locations; the pedestrian comfort criterion of 11 mph would be met at all nine of those locations. The hazard criterion would not be violated at any location tested with the project in place.

The wind hazard criterion is exceeded between seven and eight hours per year on the rooftop of the existing 600 California St. Building (location 22) in the existing setting. With the project in place, wind speeds at that location would be reduced so that the wind hazard criterion would not be exceeded. The seating comfort criterion would continue to be exceeded there (see Mitigation Measures p. 142 for a measure that would reduce winds there to meet the criteria).

NOTES – Wind

/1/ This section is based on a study entitled, Wind Tunnel Study of the 600 California St. Building, October, 1986, prepared by Dr. Bruce White for Environmental Science Associates, Inc. A summary of the report is included in Appendix B, p. A-42; the

complete report is on file and available for public review at the Department of Planning, Office of Environmental Review, 450 McAllister St.

/2/ Supplemental Wind Report, 235 Pine St. Building, July 1985, prepared by Dr. Bruce White for Environmental Science Associates, Inc. The complete report is on file and available for public review at the Department of Planning, Office of Environmental Review, 450 McAllister St.

/3/ Equivalent windspeed is an hourly wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians.

E. TRANSPORTATION

The analysis below includes a brief summary (summaries) of the materials in the Downtown Plan EIR. This summarized material is incorporated by reference as follows:

VOLUME 1: FINAL EIR TEXT.

I. SUMMARY. E. Transportation and Circulation; Travel Demand, Public Transportation, Traffic, Parking, Pedestrian Circulation, Mitigation (pp. I.E.1-I.E.6).

IV. ENVIRONMENTAL SETTING AND IMPACTS OF THE DOWNTOWN PLAN.

E. Transportation and Circulation; Introduction (pp. IV.E.1-IV.E.3); Setting (pp. IV.E.3-IV.E.20): Travel Demand Analysis, Transit, Traffic, Parking, Pedestrian Circulation; Impacts (pp. IV.E.20-IV.E.47): Travel Demand Analysis - 1990 Impacts, 2000 Impacts; Transit - 1990 Impacts, 2000 Impacts; Traffic - 1990 Impacts, 2000 Impacts; Parking - 1990 Impacts, 2000 Impacts; Pedestrian Circulation - 1990 Impacts, 2000 Impacts.

V. MITIGATION OF ENVIRONMENTAL IMPACTS (pp. V.E.1-V.E.30). E.

Transportation and Circulation: Annual Growth Rate Limits, Measures Proposed as Part of the Downtown Plan.

VI. ALTERNATIVES (pp. VII.E.1-VII.E.4). E. Transportation and Circulation: Travel Demand, Public Transportation, Traffic, Parking, Pedestrian Circulation.

VOLUME 2: APPENDICES (pp. J.1-J.38). J. Transportation and Circulation Analyses and Methodologies: Introduction, C-3 District Employer/Employee Survey Travel Demand Analysis, Future Transit Capacities, Service Vehicles, Pedestrian Circulation.

VOLUME 3: SUMMARY OF COMMENTS AND RESPONSES (pp. C&R 1-Z.4). Part 1: Responses.

The Downtown Plan EIR (Final EIR, EE81.3, certified October 18, 1984) is available for review at the Department of City Planning, the San Francisco Main Public Library, and various branch libraries.

DEMOLITION, EXCAVATION, AND CONSTRUCTION TRAFFIC/1/

During the projected 24-month construction period, transportation impacts would result from truck movements to and from the site during demolition, excavation, and construction activity. Demolition would require about three months and excavation would require about five months; these activities would generate an average of ten truck movements per day in or out of the project site, between 9 a.m. and 3:30 p.m. Trucks would use Kearny St. to the Clay St. on-ramp of the Embarcadero Freeway to haul debris and excavation materials to disposal sites in Pleasanton and South San Francisco. Construction activities (steel erection and finishing) would also generate an average of 10 truck movements per day during the remaining 16-month period. Deliveries of materials would occur between 9 a.m. and 3:30 p.m.

Construction truck access to the site would be from Kearny St. The west sidewalk on Kearny St. would be closed for about 24 months and pedestrians would be routed through a protected walkway; the curb lane would be used for loading and unloading materials. Closure of the curb lane on the west side of Kearny St. along the project frontage during project construction would result in the loss of eight loading spaces (located on Kearny St.) and a reduction of capacity on Kearny St. during the p.m. peak-period. (There is a no-stopping restriction on the west side of Kearny St. from 4:00 a.m. to 6 p.m.)

The impact of construction truck traffic would be a slight lessening of the capacities of access streets and haul routes because of the slower movements and larger turning radii of trucks. The reduction in capacity would slow movement of traffic, including Muni buses (the 9X-San Bruno Express and the 15-Third run along Kearny St. in front of the site). Lane blockage on Kearny St. by queued trucks, if it were to occur would reduce the capacity of this street and interfere with the operation of transit vehicles. Lane and sidewalk closures are subject to review and approval by the Department of Public Works.

Materials storage is proposed to be off-site, and would generate construction vehicle trips to the site; these trips are included in the above projections. Temporary parking demand from construction workers' vehicles, and impacts on local intersections from construction workers' traffic, would occur in proportion to the number of construction workers who would use automobiles. Any truck traffic from 7 a.m. to 9 a.m. or from 4 p.m. to 6 p.m. would coincide with peak-hour traffic, particularly at freeway access points, and would serve to worsen service levels. As noted above, truck traffic would be restricted to the hours of 9 a.m. to 3:30 p.m. which would avoid such peak period effects.

PROJECT IMPACTS

Travel Demand

On the basis of land use trip generation factors, the project would generate about 5,095 net new person trip-ends (pte) per day./2/ Travel generated by the existing office uses on the project site (about 1,750 pte per day) has been subtracted from the total new travel (about 6,845 pte per day) from the site to give the net new travel from the project./3/ Travel from the parking uses at the site have not been subtracted from total new travel as these trips would continue to be made to the area. The trip generation calculations include travel to and from the project site by both visitors and employees of the project. Additionally, although expressed on a person trip-end basis, the trip generation includes all travel to and from the project in autos, service vehicles and trucks, on public transit and other modes (i.e., walking, bicycles, taxis, etc.). Projected outbound (peak commute direction) p.m. peak-period and peak-hour trips by mode expected to be generated by the project are shown in Table 4, p. 109. About 725 new outbound trips from the project would occur during the p.m. peak period, of which about 450 would occur in the p.m. peak hour./4/

Assignments to travel modes for the project have been made on the basis of modal splits from the Downtown Plan EIR (EE 81.3) for the years 1984 and 2000./5/ The 1984 modal split has been used for the purpose of identifying impacts at the single-project level (as opposed to impacts at the cumulative level). The year 2000 modal splits have been applied to the project travel for the purpose of comparing project travel with cumulative future travel demand on the transportation systems serving San Francisco. The modal

TABLE 4: PROJECTED OUTBOUND TRAVEL DEMAND BY MODE FROM
600 CALIFORNIA STREET (pte/a/)

Travel Mode	P.M. Peak Period/b/ 1984 2000/c/		P.M. Peak Hour /b/ 1984 2000/c/	
Drive Alone	115	100	75	60
Car/Vanpool	100	95	70	75
Muni	180	170	95	90
BART	105	130	70	85
AC Transit	35	35	25	20
Samtrans	10	10	5	5
SPRR (Caltrain)	15	15	10	15
GGT Bus	25	30	15	15
Ferry	5	5	5	5
Walk Only	125	125	75	75
Other	10	10	5	5
TOTALS (rounded)	725	725	450	450

/a/ Person trip-ends.

/b/ The peak hour occurs during the two-hour peak period of 4 to 6 p.m.

/c/ The year 2000 modal split accounts for changes in travel behavior which are assumed to occur as a result of growth in downtown San Francisco.

SOURCE: Environmental Science Associates, Inc.

splits used were derived from aggregate data for the C-3 District, the zoning district that contains the project site, and thus represent an average condition. The actual modal split for travel from the project may vary from the C-3 District average. However, because the travel demand forecasts used to derive the average modal split data implicitly include the travel from the project, application of the average modal split data to project travel has been assumed to be sufficiently accurate for purposes of comparison.

Parking demand was projected for the 600 California St. project on the basis of the estimated vehicle traffic generated by the project. The project's land uses would create net new demand for about 175 long-term spaces and about 15 short-term spaces, for an equivalent net new daily demand of about 190 spaces. The project would provide 232 parking spaces (48 short-term and 82 long-term, the project sponsor would apply for Conditional Use authorization for the remaining 102 spaces, to be determined as long-

and/or short-term by the City Planning Commission), 37 spaces less than now on site, for a deficit of 227 parking spaces relative to net new parking demand (269 existing spaces + 190 space demand = 459 spaces, - 232 proposed spaces = a deficit of 227 spaces).

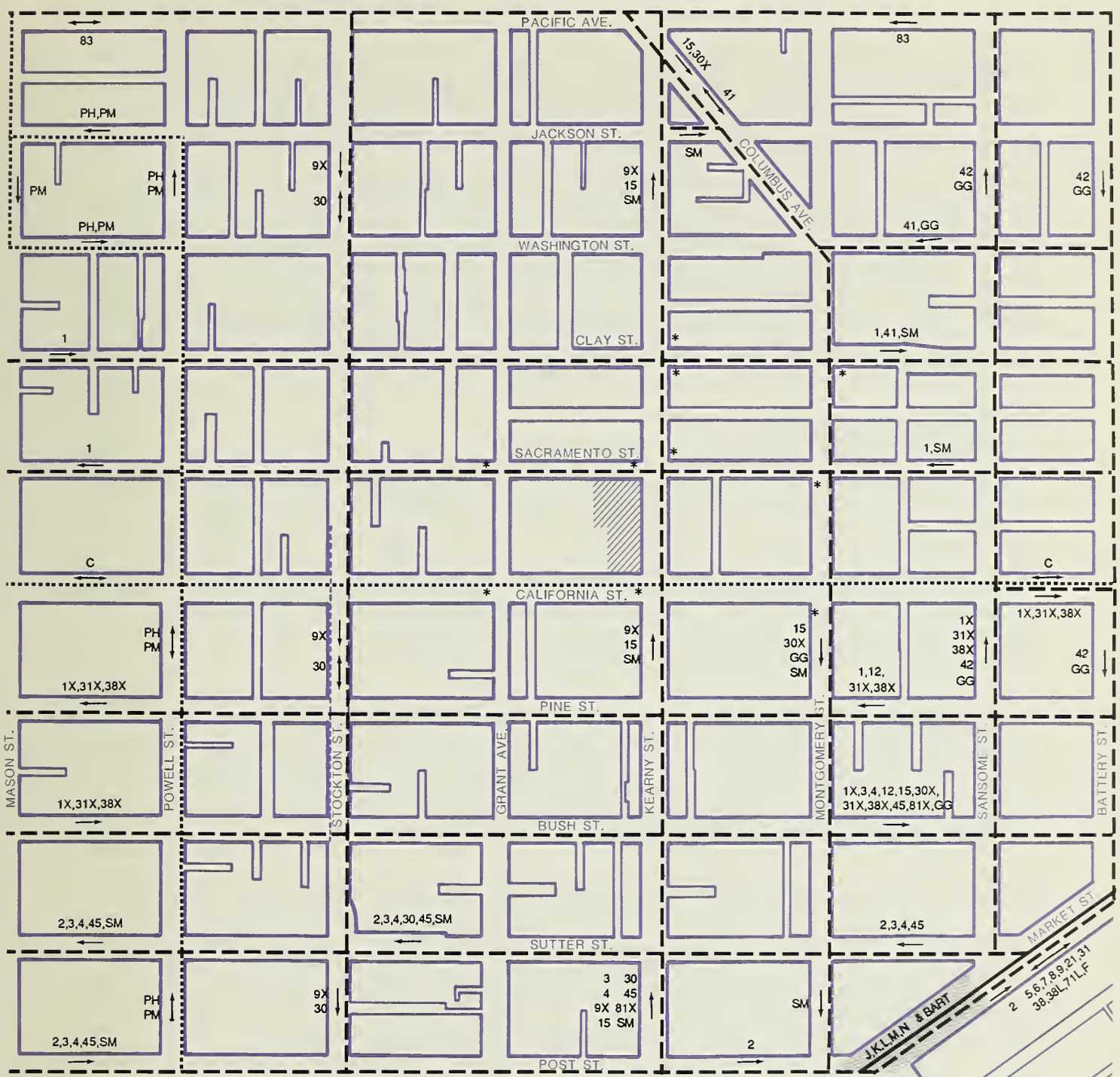
The project would respond to Objective 1, Policy 7 of the Transportation Element of the San Francisco Master Plan, to "seek means to reduce peak travel demand." /6/ As required by Section 163 of the City Planning Code, a member of the building management staff would be designated as a "transportation broker" to coordinate measures that are part of a transportation management program, such as: encouraging a flexible time system for employee working hours (to be developed by project tenants in consultation with the Department of City Planning) to reduce peak-period congestion by a planned spreading of employee arrivals and departures; encouraging transit use through the on-site sale of BART, Muni, and other carriers' passes to employees; and encouraging employee carpool and vanpool systems in cooperation with RIDES for Bay Area Commuters by providing a central clearinghouse for carpool and vanpool information.

The project would not respond to policies of the Downtown Plan that discourage long-term parking in the downtown core (see p. 121).

Local Transit

The closest Muni bus stops to the project site are as follows: on Sacramento St. at the northwest corner of its intersection with Kearny St., serving the 1-California; on Kearny St. at the northeast corner of its intersection with California St., serving the 9X-San Bruno Express and the 15-Third; on California St. west of its intersection with Kearny St., serving the C-Cable Car line. Muni Metro and BART service in the Market St. subway are accessible via the Montgomery St. station (about five blocks south of the site), and the Embarcadero Station (about six blocks east of the site). Figure 28, p. 111, shows transit routes in the project area. Photographic examples of p.m. peak-hour loadings on Muni vehicles are shown in Appendix C, Figures C-2, pp. A-53 to A-54.

During the p.m. peak hour in 1984, all of the transit agencies were found to be operating in Level of Service D or better, with the exception of BART Transbay where conditions were found to be at Level of Service F, and MUNI in the northwest and southwest corridors, where operations were found to be in LOS E. Table C-1, Appendix C, p. A-48,



LEGEND

- BART AND MUNI METRO STATION
- BART ROUTE AND MUNI METRO ROUTE
- SURFACE TRANSIT ROUTE
- CABLE CAR ROUTE
- ROUTE DESIGNATION AND DIRECTION
1X, 9X, 31X, AND 38X MUNI ROUTES INCLUDE
1AX, 1BX, 9AX, 9BX, 31AX, 31BX, 38AX,
AND 38BX ROUTES.

- GG GOLDEN GATE TRANSIT ROUTE
- SM SAMTRANS ROUTE
- * BUS STOP (WITHIN ABOUT ONE BLOCK OF PROJECT SITE)
- PROJECT SITE



600 California Street Federal Home Loan Bank of San Francisco

SOURCE: MUNI SAN FRANCISCO STREET & TRANSIT MAP, MARCH 1986;
GOLDEN GATE TRANSIT BUS & FERRY SYSTEM MAP, MARCH 1986;
SAMTRANS EXPRESS SERVICE, MAY 1986.

FIGURE 28
TRANSIT ROUTES IN
THE PROJECT AREA

contains descriptions of the various Levels of Service for bus transit. In the p.m. peak hour, the project would generate about 95 new Muni trips and about 70 new BART trips outbound from the project site. Addition of the project p.m. peak-hour Muni riders to the existing (1984) Muni ridership would not increase the loading ratios on any corridors, and thus would not change the Levels of Service. The number of Muni riders from the project would not be sufficient to affect Muni operations in any of the four corridors. Addition of BART riders from the project to the existing BART ridership would increase the p.m. peak hour transbay loading ratio slightly but would not increase the westbay loading ratio; the Levels of Service on either transbay or westbay lines would not change.

Transit Corridor Analysis

The project would contribute to increases in transit ridership in the major transit corridors leading from downtown San Francisco. Existing peak-period and peak-hour transit ridership would be increased by about 0.2%. A ridership increase of this magnitude would not be measurable against the day-to-day fluctuations in transit ridership and would not have a noticeable effect on transit levels of service.

Transit capacity increases have been projected in the Downtown Plan EIR based on each transit agency's Five-Year Plan. This is discussed on pp. IV.E.24-IV.E.30 of the Downtown Plan EIR; specific capacity increases for the year 2000 are identified in Appendix J, p. J.26 of the Downtown Plan EIR.

Cumulative development under the Downtown Plan to the year 2000 in conjunction with planned capacity increases of transit carriers would be expected to cause the following changes in transit Levels of Service during the peak period: Muni Northwest Corridor, E to D; BART Transbay, F to E; AC Transit, C to D; Golden Gate Ferry, B to A; Tiburon Ferry, A to B; and Caltrain, B to C (pp. IV.E.29 of the Downtown Plan EIR).

Project Transit Costs

Muni. The estimated 1981-82 (most recent available) net marginal cost (or increase in the deficit for Muni operations) per additional ride is \$0.50./7/ This deficit-per-ride figure, because it is a marginal cost, is appropriate for small increases in Muni ridership (such as those requiring one or a few additional vehicle trips). Assessments of costs that would

result from cumulative development require the inclusion of additional cost factors and may be best projected using average costs.^{/8/} It is reasonable to conclude that average costs would be significantly higher than marginal costs.

The project would generate about 84,700 peak-period peak-direction rides per year in the year 2000, which would generate a cost deficit to Muni of about \$42,340, assuming that the cost-per-ride deficit remains the same.^{/9/} (This conclusion should be qualified because the Muni deficit-per-passenger-trip figure is based on 1981-82 data, and because the total project-generated deficit is calculated only for those riders who use Muni as their primary mode of transportation, excluding riders who would use a combination of transportation carriers, such as Muni and Caltrain. More recent data that would allow a more precise estimate of costs are not available.) The project would offset this deficit through its contributions to the General Fund, the Transit Impact Development Fee, and sales tax revenues.

On April 27, 1981, the San Francisco Board of Supervisors approved Ordinance 224-81 establishing the Transit Impact Development Fee (TIDF) to support additional operating costs and capital improvements for Muni transit services associated with new downtown commercial development. The ordinance established a one-time fee of up to \$5.00 per gross sq. ft. upon occupancy of new office space within the greater downtown area; the 600 California St. project site is located within the fee assessment area. The TIDF ordinance has been in litigation almost since its inception. On January 4, 1985, the San Francisco Superior Court issued a decision upholding the ordinance. On March 12, 1985, the plaintiffs, a group of downtown property owners, appealed. Money is being collected by the City pursuant to the ordinance, and deposited in an escrow account, pending resolution of the litigation. Under the ordinance, the project would generate about \$1.08 million in one-time fee revenues to Muni. The fee is intended to recover additional transit costs for the entire economic life of a building, and thus cannot be compared directly to the annual Muni deficit discussed above. The fees collected under the ordinance would, however, reduce the amount of General Fund revenue support necessary

- for existing and future Muni operations. The final determination of the TIDF fee would be made on the basis of a more detailed review of architectural plans by the City.

The project would also offset Muni's annual operating deficit attributable to the project through its contributions to General Fund revenues, which would be derived from a variety of taxes levied on the proposed project. In the past, a portion of General Fund revenues has been allocated to Muni. The historical level of contribution of General Fund revenues

to Muni could change, however, due to the recent court decision upholding the Transit Impact Development Fee. Because of the variable relationships of the sources from which Muni receives operating funds, the annual General Fund contribution from the project to Muni cannot be quantified.

General Objective 1, Policy 6 of the Transportation Element states as a goal to "develop a financing system for transportation in which funds may be allocated without unnecessary restriction for priority improvements according to established policies." (p. 10) The project sponsor has agreed to participate in legally adopted funding measures for downtown transit funding, proportional to demand created by the project.

BART. For the fiscal year ending June 30, 1985, the average net operating deficit per passenger trip for BART was about \$1.20./10/ On the basis of about 66,000 rides per year in the year 2000, the estimated annual BART deficit attributable to the project would be about \$79,200, assuming that the cost per ride deficit is the same./11/ The project would generate a total of about \$17,300 in revenues to BART, including about \$6,500 in property tax revenues, and about \$10,800 from the 75% of the 0.5% transit sales tax allocated to BART. This amount does not include the remaining 25% of the 0.5% BART sales tax revenue distributed by MTC among BART, Muni and AC Transit. After subtraction of BART's revenues from sales and property taxes that would be generated by the project, the net operating deficit of BART due to the project would be about \$61,900. BART's operating deficit per passenger is likely to decline in real terms as planned service improvements become operational in the future.

Pedestrian Movements

Pedestrian entrances to the office lobby would be on Kearny and California Sts. Ground-floor retail space would have entrances on Kearny and Sacramento Sts. (see Figure 3, p. 26).

The project at full occupancy would generate about 220 additional pedestrians on sidewalks and crosswalks in the vicinity of the site during the 15-minute peak-period of the noon hour, and about 155 new pedestrians during the p.m. peak 15-minute period. Pedestrian travel destinations were estimated on the basis of projected major travel modes. Pedestrian trips were assigned to sidewalks and crosswalks on the basis of these destinations.

Operating conditions on sidewalks and crosswalks have been evaluated in terms of pedestrian flow categories or regimen, which relate the density of pedestrians in a specific time period (pedestrians per foot of clear sidewalk width per minute) to the quality of pedestrian flow (the difficulty of maintaining walking paths and speeds on a sidewalk)./12/ Appendix C, Table C-2, p. A-52 shows the relationships among flow rates, walking speed, path choice, and interaction among pedestrians for each flow regime. Appendix C, Figure C-1, pp. A-49 to A-51, shows photographs of sidewalk conditions for each flow regime. Typically, an upper limit for desirable conditions is 14 pedestrians per foot per minute (p/f/m), defined as crowded, although conditions as high as 18 p/f/m, a congested condition in which pedestrians are subjected to extreme crowding, have been documented./12/

Table 5, p. 117, summarizes pedestrian flow conditions on sidewalks and crosswalks adjacent to the site and at the intersections of Kearny and California Sts. and Kearny and Sacramento Sts. The sidewalks and crosswalks adjacent to the project site currently operate in open, unimpeded and impeded conditions during the noon-peak 15-minute period and unimpeded conditions during the p.m.-peak 15-minute period./13/ Conditions on the sidewalks and crosswalks adjacent to the project following addition of the project pedestrian travel to the existing (1984) pedestrian LOS would worsen from open to unimpeded at the Sacramento St. sidewalk during the noon 15-minute peak period, from unimpeded to impeded at the Kearny St. sidewalk and at the crosswalks across Sacramento St. at Kearny St. and across Kearny St. at California St. during the noon 15-minute peak period. P.M. peak conditions would worsen from unimpeded to impeded at the Kearny St. sidewalk and at the crosswalk across California St. at Kearny St. during the p.m. 15-minute peak period. Other sidewalks and crosswalks would not change from existing, unimpeded, conditions. There would continue to be adequate facilities for pedestrians on the sidewalks and crosswalks adjacent to the project site with these changes.

- The project would have a 20-ft. curb-cut for the project garage and loading access. The potential for vehicle-pedestrian conflicts at the site would be increased as a result of trucks crossing the sidewalk to get to the loading docks, although the number of cars crossing the sidewalks to get to parking spaces would decrease slightly, because there
- would be 37 fewer parking spaces.

In the year 2000, during the noon peak, sidewalks and crosswalks adjacent to the project would operate in the unimpeded and impeded ranges (see Table 5, p. 117). In the year 2000, crosswalks in the project vicinity would operate under the same conditions as the existing plus project case (see discussion above). The project pedestrian traffic would represent between 16% and 42% of the pedestrian volumes on the sidewalks, and between 14% and 32% of the pedestrian volumes on the crosswalks adjacent to the project block in the year 2000.

P.M. peak-hour operations in the year 2000 would also be in the unimpeded and impeded ranges, during the p.m. peak 15-minute period. Conditions would remain the same in the year 2000 as with existing plus project conditions. Project pedestrian traffic during the p.m. peak hour would represent between 12% and 34% of the pedestrian volumes on the sidewalks, and between 13% and 29% of the p.m. peak-hour crosswalk pedestrian volumes would be from the project in the year 2000.

Although as noted above, for some cases conditions would be in the impeded range, there would continue to be adequate facilities for pedestrians on the sidewalks and crosswalks in the study area.

Local Intersection Traffic

- The project proposes about 48 short-term and 82 long-term parking spaces in a three-level basement, with access from Sacramento St. The remaining 102 proposed spaces would be either long- or short-term, subject to a determination by the City Planning Commission as discussed in the last paragraph of p. 33a. A net total of 37 spaces would be eliminated (there are currently 269 spaces on the site). Project-related parking, loading and service vehicle traffic would result in increases in traffic at intersections in the downtown, including intersections in the immediate project vicinity. As the project would result in a net reduction of on-site parking spaces, the overall number of vehicle trips to and from the site would be reduced. Vehicles currently using the existing facility, and new vehicular traffic generated by the project that would not be accommodated by project parking, would be expected to use other parking in the downtown area; this traffic would be dispersed to intersections throughout the area.

The project would change garage access at the site. The project parking garage entrance would be on Sacramento St. and the exit would be on Kearny St.; the existing garage has entrances/exits on both Kearny and Sacramento Sts. Vehicles would enter the project

TABLE 5: PEAK PEDESTRIAN VOLUMES AND FLOW REGIMEN (Project Side of Street)

Moon Peak /d/	Total Width (Feet)	Effective Width (Feet) /a/	Existing		Existing Plus Project		2000		Project Percent
			p/f/m/b/	Flow Regimen/c/	p/f/m	Flow Regimen	p/f/m	Flow Regimen	
Kearny St. Sidewalk	14.5	10.0	1.3	Unimpeded	2.4	Impeded	2.8	Impeded	42%
California St. Sidewalk	14.8	10.75	1.1	Unimpeded	1.4	Unimpeded	1.7	Unimpeded	16%
Sacramento St. Sidewalk	10.0	6.8	0.4	Open	0.7	Unimpeded	0.8	Unimpeded	27%
Crosswalk Across Sacramento St. at Kearny St.	13.5	13.5	2.0	Unimpeded	2.4	Impeded	3.1	Impeded	14%
Crosswalk Across Kearny St. at Sacramento St.	10.5	10.5	0.9	Unimpeded	1.5	Unimpeded	1.7	Unimpeded	32%
Crosswalk Across Sacramento St. at California St.	13.25	13.25	2.3	Impeded	2.9	Impeded	3.7	Impeded	18%
Crosswalk Across Kearny St. at Sacramento St.	14.5	14.5	1.8	Unimpeded	2.3	Impeded	2.9	Impeded	18%
Crosswalk Across Kearny St. at California St.									
P.M. Peak/d/									
Kearny St. Sidewalk	14.5	10.0	1.3	Unimpeded	2.1	Impeded	2.5	Impeded	34%
California St. Sidewalk	14.8	10.75	1.1	Unimpeded	1.3	Unimpeded	1.6	Unimpeded	12%
Sacramento St. Sidewalk	10.0	6.8	0.6	Unimpeded	0.7	Unimpeded	0.9	Unimpeded	17%
Crosswalk Across Sacramento St. at Kearny St.	13.5	13.5	1.1	Unimpeded	1.4	Unimpeded	1.7	Unimpeded	18%
Crosswalk Across Kearny St. at Sacramento St.	10.5	10.5	0.7	Unimpeded	1.1	Unimpeded	1.3	Unimpeded	29%
Crosswalk Across Sacramento St. at California St.	13.25	13.25	1.7	Unimpeded	2.9	Impeded	3.6	Impeded	13%
Crosswalk Across Kearny St. at California St.	14.5	14.5	1.2	Unimpeded	1.5	Unimpeded	1.9	Unimpeded	19%

/a/ The effective width is the narrowest portion of the sidewalk and is calculated by subtracting the space taken by poles planter boxes, people standing at windows etc., from the total width.

/b/ Pedestrians per foot of effective sidewalk width per minute.

/c/ See Table C-2 and Figure C-2, Appendix C, for description of pedestrian flow regimens.

/d/ Peak 15-minute periods.

SOURCE: Environmental Science Associates, Inc.

garage via the Kearny/Sacramento Sts. intersection. Under existing conditions traffic entering the site does not need to pass through this intersection, but can enter the site directly from Kearny St. Therefore, the project would increase the number of vehicles passing through the Kearny/Sacramento Sts. intersection as all traffic entering the site would have to pass through that intersection. The intersection of Sacramento and Kearny Sts. presently operates at LOS C (see Table 6, p. 119). Level of Service descriptions are shown in Table C-3, Appendix C, p. A-56. In the year 2000, as a result of cumulative development, operations at this intersection are projected to deteriorate to LOS D (see Table 6, p. 119). The project alone would not cause the Level of Service (LOS) to change at this intersection.

- Cars leaving the site would exit onto Kearny St. and continue northbound through the Kearny/Sacramento Sts. intersection or, turn left (west) on Sacramento St. and pass through the Grant Ave./Sacramento St. intersection. The project would result in a net reduction of on-site parking spaces. The overall number of cars from the site passing through the Grant Ave./Sacramento St. intersection would remain approximately the same (or decrease slightly), as all project traffic in the future would exit onto Kearny St. The Level of Service would remain at LOS B, at the Grant Ave./Sacramento St. intersection, with the addition of project-generated traffic (as shown in Table 6). In the year 2000, with the addition of cumulative traffic, operations at this intersection are projected to deteriorate to LOS C. The project would not contribute more than with existing conditions to the deterioration in the LOS.

Freeway On-Ramp Analysis

Traffic operations at the intersection of Clay and Battery Sts. serving the freeway on-ramp nearest the project site are shown in Table 6. The project would incrementally contribute to traffic at this freeway on-ramp during the p.m. peak hour. This intersection currently operates in LOS C conditions (see Table C-3, Appendix C, p. A-56 for definitions of LOS). Operation at LOS C represents good conditions.

Project traffic alone would not change the LOS at the intersection of Clay and Battery Sts.; however, the V/C ratio would increase slightly. For the year 2000 projections, existing traffic volumes were increased by a 19% average growth factor based on the Downtown Plan EIR traffic analysis. The growth factor represents a worst-case, unrestrained auto demand condition for street traffic in the downtown and, as such, is

TABLE 6: PROJECTED PEAK-HOUR INTERSECTION VOLUME-TO-CAPACITY RATIOS (V/C) AND LEVELS OF SERVICE (LOS)/a/

<u>Intersection</u>	<u>Existing</u>		<u>Existing + Project</u>		<u>Downtown Plan (2000)</u>	
	<u>V/C</u>	<u>LOS</u>	<u>V/C</u>	<u>LOS</u>	<u>V/C</u>	<u>LOS</u>
Sacramento & Kearny Sts.	0.72	C	0.74	C	0.81	D
Sacramento St. & Grant Ave.	0.67	B	0.69	B	0.76	C
Clay & Battery Sts.	0.74	C	0.75	C	0.81	D

/a/ Level of Service descriptions and relationship to V/C ratios are shown in Table C-3, p. A-56 of Appendix C.

SOURCE: Environmental Science Associates, Inc.

probably higher than actual traffic growth may be in the future in the downtown. Motorists confronted with increased delays on surface streets would be expected to alter their travel patterns to use less congested routes (to the freeway ramps) or to travel at different times (to avoid periods of traffic congestion). The intersection of Clay and Battery Sts. is at LOS C as noted. Peak-hour conditions at the intersection of Clay and Battery Sts. would be expected to deteriorate by the year 2000 as shown in Table 6 to LOS D. Operation at LOS D represents fair conditions. Expanded areas of traffic congestion would disrupt surface transit operations.

Muni operations would be adversely affected by increased congestion. Operation of Muni surface transit routes through the congested areas would be impeded; this would lead to decreased levels of Muni service since scheduled headways would not be met.

Freeway Corridor Analysis

The project would contribute to increases in traffic on the major freeways serving downtown San Francisco. Both the East Bay and Peninsula corridors would have excess

peak-hour demand that would not be met during the peak period. The North Bay corridor would have excess demand in the peak period. Excess auto demand would result in either a spreading of the demand into the hours adjacent to the peak period or in increased transit and ridesharing use should additional transit service (beyond that assumed to occur by the year 2000) or ridesharing incentives be provided (p. IV.E.33 of the Downtown Plan EIR).

Traffic generated by the project would increase total traffic on major freeways during the p.m. peak period and the p.m. peak hour by about 0.3%. Such increases would not be measurable against the day-to-day fluctuations in traffic volumes. Because the Bay Bridge p.m.-peak-hour eastbound traffic flow is functionally at capacity, the travel demand from the project would not be expected to increase the flows on the Bay Bridge in the peak hour; rather the East-Bay-bound auto traffic from the project would most likely compete with and possibly displace existing users of the Bay Bridge into later portions of the peak period. This competition for access would occur at the on-ramps to the Bay Bridge and any displacement of existing users to later time periods would depend on the time of arrival of project vehicles at the on-ramps. Some drivers would shift to carpools or transit as a result of cumulative displacement.

OFF-STREET PARKING AND LOADING REQUIREMENTS AND DEMAND

Parking

The project would create net new long-term parking demand for about 175 spaces and net new demand for about 15 short-term spaces for a total net new demand of about 190 equivalent daily spaces. The project would provide 232 independently accessible parking spaces, about 37 less than now on the site. Based on a parking turnover survey, 240 vehicles use the garage at 525 Kearny and 29 vehicles use the spaces located in the 600 California St. building. Demand from the project plus existing demand on site would result in an unmet demand of 227 equivalent daily spaces ($190 + 269 = 459$. $459 - 232 = 227$ spaces).

The estimated parking demand (both long-term and short-term) from the C-3 District in 1984 was found to be about 45,300 spaces, which would occupy about 94% of the 48,000 parking spaces in and near the C-3 District. The short-term parking demand, while representing about 25% of the equivalent daily demand, is about 65% of the daily

vehicle travel. Although the equivalent daily demand would leave about 10% of the parking supply vacant, surges in short-term demand (more travel in one period than in another period) can cause temporary localized overloads of parking facilities within various portions of the downtown, even though parking may be available elsewhere in the downtown.

The Downtown Plan discourages "new long-term spaces in and around the downtown" (Downtown Plan, p. 126). The project would provide 82 long-term spaces and 48 short-term spaces and 102 yet to be determined as long- and/or short-term spaces.

The project would not respond to Objective 1, Policies 1, 2, 3, 6, and 8 of the Downtown Transportation Plan, portion of the Transportation Element of the Master Plan. Policy 1 encourages conversion of existing parking facilities to short-term use and rate structures which favor short-term parking. Policy 2 states that additional short-term parking facilities should be located in the designated parking belt outside the downtown core. Policy 3 discourages provision of long-term parking spaces in and around downtown and states that replacement of long-term parking spaces lost in the downtown should occur in areas peripheral to the downtown commercial district. Policy 6 seeks to organize and control traffic circulation in the downtown core by channeling vehicles into peripheral parking facilities. Policy 8 designates the downtown core as an automobile control area.

The C-3 District would generate demand for approximately 58,000 equivalent daily parking spaces in the year 2000 under the Downtown Plan, an increase of 28% from 1984. Short-term demand would continue to represent about 25% of the total demand. The project parking demand would represent about 0.3% of the total demand from the C-3 District. As noted in the Downtown Plan EIR, the parking supply in the year 2000 has been assumed to increase to about 51,000 spaces. There would be a parking deficit of about 6,000 spaces in that year if vehicular demand occurs as projected. However, the analysis in the Downtown Plan EIR for the year 2000 forecasts excess auto demand in the peak hour and the peak period. If the excess demand is accommodated on transit or ridesharing, then the overall parking demand would decrease from the above estimate by about 2,300 spaces (pp. IV.E.41 of the Downtown Plan EIR).

If the goals of the Downtown Plan are met, total parking demand in the year 2000 would be about 48,100 equivalent daily spaces, an increase of six percent over 1984. If the goals were achieved, there would not be a parking deficit.

As required by City Planning Code Section 155, nine spaces in the parking garage would be for handicapped parking. Additionally, Section 155(g) requires that parking spaces in the C-3 District shall maintain a rate or fee structure that encourages short-term use and discourages all-day parking; the parking rate schedule would be reviewed and approved by the Department of City Planning, or alternatively, the project sponsor would agree to be bound by a formula, to be developed by the Department of City Planning, which structures rates to favor short-term parking for the proposed 48 replacement short-term spaces. The project sponsor proposes to provide 48 short-term replacement spaces and 82 long-term spaces as part of accessory parking, and would not structure the fee schedule such that long-term parking would be discouraged for these spaces; the project would therefore not meet Section 155(g). No exception to 155(g) is allowable under Section 309; the project sponsor has requested an opinion from the Zoning Administrator as to whether a long-term rate structure could be allowed by the Variance procedure. The 102 remaining spaces, which would require Conditional Use authorization, would be reviewed by the Planning Commission, which would determine whether these spaces would operate as long- or short-term; if replacement short-term parking were not required by the Planning Commission as proposed, this parking would be a part of the Conditional Use application. The project sponsor would be required to provide 12 bicycle storage spaces in the parking garage.

Loading

Table 7 p. 123, shows total service vehicle travel and average hourly service-vehicle demand for the project, based upon data published in Center City Circulation Program: Pedestrian Circulation and Goods Movement./14/ The project would generate about 68 service vehicle stops per day. Average hourly loading space needs are given in terms of spaces per hour per 10,000 gross square feet of building space; average demand for the project would be about 3.3 spaces per hour and peak hourly demand would be for about 4.1 spaces.

Under City Planning Code Section 152, the project would be required to provide three loading docks, or their equivalent, to serve the 312,700 gross sq. ft. of office space (0.1 spaces per 10,000 gsf = 3.1 spaces for 312,700 gsf of office space). Retail use in the project would be less than 10,000 sq. ft. and would therefore not be required to provide loading facilities. The project would have three loading docks with access from Sacramento St. The Code requires that the first loading dock have a width of ten ft., a minimum length of 25 ft. and a minimum vertical clearance of 12 ft.; each additional

TABLE 7: PROJECTED SERVICE-VEHICLE TRAVEL ATTRIBUTABLE TO THE PROJECT/a/

Use	Space (GSF)/b/	Daily Stops/ 10,000 sq. ft. of GSF/b/	Daily Stops	Spaces/Hour/ 10,000 sq. ft. of GSF/b/	Average Spaces/ Hour
Office	312,700	2.1	66	0.1	3.1
Retail	7,900	3.0	<u>2</u>	0.2	<u>0.2</u>
TOTALS			68		3.3

/a/ Service-vehicle travel has been included in total travel calculated for the project.

/b/ Gross square feet of floor space.

SOURCES: Environmental Science Associates, Inc.; Department of City Planning, 1980, Center City Circulation Program.

required space should be 35 ft. in length, 12 ft. wide and have a vertical clearance of 14 ft. The number of project loading spaces and configuration would be in conformance with the requirements in the code. The loading area would include a truck turntable which would allow trucks to turn around off street. Then, no backing-up of trucks would occur on Sacramento St.

NOTES - Transportation

/1/ Construction data are based on a letter from Mike Ford, Swinerton & Walberg Co., dated May 7, 1986 and a phone conversation with Chuck Kuplin, Project Manager, Swinerton & Walberg Co., May 19, 1986. These are on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St.

/2/ San Francisco Department of City Planning, Transportation Guidelines for Environmental Impact Review: Transportation Impacts, September 1983. This document describes the procedure used to calculate travel demand from the project. Daily trip generation rates of 18.1 person trip-ends (pte) per 1,000 gross sq. ft. of office space and 150 pte per 1,000 gross sq. ft. of retail space were used to generate travel from the project. The two trip generation rates are for independent land uses. When used to generate travel from more than one land use on the same site the rates may overestimate total travel to the site since a portion of the travel from each of the land uses may occur between land uses on the site and not leave the site. Such trips are referred to as "linked trips." The calculations for this project have not been discounted to account for linked trips and thus present a "worst-case" scenario. The September 1983 Transportation Guidelines are on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.

/3/ Deduction of existing travel is per the Transportation Guidelines.

/4/ The percentages of travel occurring in the peak period and the peak hour are from the Transportation Guidelines. Total travel during each of the periods has been adjusted to show only outbound (leaving the downtown area in the peak commute direction) travel. The outbound travel consists of all of the work-related travel and half of the other (non-work) travel.

/5/ San Francisco Department of City Planning, Downtown Plan Environmental Impact Report (EIR), EE81.3, certified October 18, 1984. This document is an analysis of projected growth in the C-3 Districts to the year 2000 under the Downtown Plan and five alternatives. The transportation analysis in the EIR includes projections of future modal splits for work and other (non-work) travel for the p.m. peak period, peak hour, and daily time periods. This document is on file with and available for public review at the Department of City Planning, 450 McAllister St.

/6/ San Francisco Department of City Planning, January 1983, Transportation, an Element of the Master Plan.

/7/ This deficit-per-ride figure is based upon information provided in: Touche Ross & Co., Transit Impact Development Fee Cost Study, Fiscal Year 1981-82, July 1983, Corrected September 9, 1983, and consultation with Bruce Bernhard, Chief Financial Analyst, San Francisco Municipal Railway, telephone conversations, October 11, 1984, and March 20 and May 13, 1985. The calculation of the peak-period marginal deficit (additional cost per ride minus additional revenue per ride) was done by ESA.

/8/ According to Muni, the appropriate technique for determining the costs to Muni of cumulative development is an average cost analysis which would include both capital and operating costs. Application of this technique, however, is limited because relevant capital cost data are not available from Muni. Further, capital costs are difficult to allocate on a person-trip basis, as capital expenditures occur from time to time in large amounts, not necessarily annually. The established method of allocating capital costs is through depreciation, which is based on historical depreciation costs, not replacement costs. Such an estimate would be low in comparison with the costs of new capital improvements required for a single passenger trip. The use of existing capital cost data would underestimate future capital cost needs. Existing Muni accounting statistics do not enable future capital costs to be calculated on a per-passenger-trip basis (Bruce Bernhard, Muni Chief Financial Analyst, telephone conversation, March 25, 1985).

/9/ The deficit due to the project would be: 336 peak-period trips per day x 252 working days per year x \$0.50 deficit = \$42,340. The cost deficit estimate is based on the assumption that essentially all vehicles are operating at capacity during peak periods and additional riders would require new vehicle trips. It was assumed that during off-peak periods, all vehicles operate with excess capacity, resulting in an average off-peak marginal cost of zero. These cost estimates are appropriate for project costs to Muni of a single office building. Assessments of costs that would result from cumulative development require the inclusion of additional cost factors and may be best projected using average cost data. Muni does not have data that would enable it to estimate the average cost per passenger trip. It is reasonable to conclude that average costs would be significantly higher than marginal costs.

/10/ Ward Belding, Supervisor, Office of Research, BART, telephone conversations, September 27, 1985. The \$1.20 average deficit per trip is based on all operating costs and revenues for the entire system and is not specific to San Francisco trips. Available data from BART do not enable peak and non-peak period costs to be differentiated.

/11/ 262 BART trips per day x 252 days/year x \$1.20 = \$79,200.

/12/ Pushkarev and Zupan, 1975, Urban Space for Pedestrians, MIT Press, Cambridge, Mass., pp. 85 to 117.

/13/ Pedestrian counts were made by Environmental Science Associates, Inc. on May 19 (Monday) and 20 (Tuesday), 1986 from 12 p.m. to 1 p.m. and from 4:30 p.m. to 5:30 p.m.

/14/ San Francisco Department of City Planning, 1980, Center City Circulation and Goods Movement, Working Papers 1, 2 and 3, and Final Report.

F. AIR QUALITY

The analysis below includes a brief summary (summaries) of the material in the Downtown Plan EIR. This summarized material is incorporated by reference as follows:

VOLUME 1: FINAL EIR TEXT.

I. SUMMARY (pp. I.I.1-I.I.31). I. Air Quality; Short-term Construction Impacts, Long-Term Operation Impacts: Pollutant Emissions, Ozone Concentrations, Carbon Monoxide Concentrations, Total Suspended Particulate Concentrations, Nitrogen Dioxide Concentrations, Sulfur Dioxide Concentrations.

IV. ENVIRONMENTAL SETTING AND IMPACTS OF THE DOWNTOWN PLAN. I. Air Quality; Setting (pp. IV.I.1-IV.I.9): Introduction, Existing Regional and Local Air Quality: Ozone, Carbon Monoxide, Total Suspended Particulate, Nitrogen Oxides, Sulphur Dioxide; Air Quality Planning and Forecasting: Ozone Modeling for the 1982 Bay Area Air Quality Plan, Carbon Monoxide for the 1982 Bay Area Air Quality Plan, Carbon Monoxide Modeling for Downtown San Francisco, Other Pollutants. Impacts (pp. IV.I.9-IV.I.19): Short-term Construction Impacts; Long-Term Operation Impacts - Compatibility with Air Quality Plans, Pollutant Emissions; Ozone Concentrations - 1990, 2000; Carbon Monoxide Concentrations - 1990, 2000; Total Suspended Particulate Concentrations - 1990, 2000; Nitrogen Dioxide Concentrations - 1990, 2000; Sulphur Dioxide Concentrations - 1990, 2000.

V. MITIGATION OF ENVIRONMENTAL IMPACTS (pp. V.I.1-V.I.2). Annual Limits on New Commercial Development in the City; Measures Identified by this Report.

VOLUME 2: APPENDICES (pp. O.1-O.9). Calculations of Air Pollutant Emissions and Carbon Monoxide Concentrations.

VOLUME 3: SUMMARY OF COMMENTS AND RESPONSES (pp. C&R 1.1-11). Part 1: Responses.

Upon completion, the project would affect air quality in two ways. Emissions would be generated by project-related traffic, and by combustion of natural gas for building space and water heating. Transportation sources would account for over 95% of project-related emissions.

The California Legislature mandated a biennial Inspection and Maintenance (I/M) program which applies to most cars and light trucks in California. This program went into operation in March 1984. An annual I/M program was evaluated in the 1982 Bay Area Air Quality Plan based on the 1979 source inventory. Based on predicted reduction in hydrocarbons and CO of 25% in vehicles covered, a reduction in total motor vehicle-generated CO of about 18% would be expected. The reduction in total regional CO emissions would be about 16%. The reduction in motor vehicle-generated hydrocarbons would be 17%; the reduction in total regional hydrocarbon emissions would be about six percent. Vehicle emission factors used in the model in the Downtown Plan EIR did not take the I/M program into account. To account for reductions from the I/M program, revised emission factors have been input into the revised Modified Linear Rollback (MLR) for this project. This is the same version of the revised MLR method which was developed for the Downtown Plan EIR. By not quantifying predicted reductions from the I/M program, CO emissions were over-predicted in the Downtown Plan EIR.

Curbside CO concentrations at selected intersections that would be affected by project-generated traffic and by cumulative development traffic were projected for conservative conditions, and are compared with ambient standards in Table 8, p. 127. In 2000, the average vehicle is expected to emit less carbon monoxide (CO) than in 1984 due to ongoing state and federal emissions controls.

TABLE 8: EXISTING AND PROJECTED CURBSIDE CARBON MONOXIDE CONCENTRATIONS AT SELECTED INTERSECTIONS

Intersection	Averaging Time	Concentrations (ppm)/a/	
		1984	Downtown Plan 2000/b/
Grant & Sacramento	1-hour	8.7	4.8
	8-hour	6.8	3.6
Battery & Clay	1-hour	13.0	7.0
	8-hour	10.3	5.6
Kearny & Sacramento	1-hour	10.3	5.7
	8-hour	8.0	4.6

/a/ Calculations for all scenarios were made using a revised version of the Modified Linear Rollback (MLR) method described in the Downtown Plan EIR. Background concentrations were calculated to be 7.4 ppm for one hour and 5.7 ppm for eight hours in 1984, and 4.2 ppm for one hour and 3.0 ppm for eight hours in 2000. Underlined values are in violation of the state or federal CO standards. The one-hour state standard is 20 ppm, the one-hour federal standard is 35 ppm, and the eight hour state and federal standards are 9 ppm. Emission rates were derived from the California Air Resources Board EMFAC6D computer model, as published in the BAAQMD's Guidelines, November 1985. These emissions take into account the reduction in CO as a result of the ongoing Statewide Inspection/Maintenance Program.

/b/ Based on the growth forecast methodology contained in the Downtown Plan EIR. The project would be contained within this forecast.

SOURCE: Environmental Science Associates, Inc. and Downtown Plan EIR.

Currently, the eight-hour CO standard is estimated to be violated at the Battery and Clay and Kearny and Sacramento intersections. CO concentrations are predicted to be less in 2000 than in 1984 and would not violate the standards at this intersection in this future scenario.

Table 9, p. 128, shows projected daily emissions of pollutants in 2000 from project-generated traffic, projected daily emissions in 2000 for C-3 District development projected by the Downtown Plan EIR, and total emissions projected for the entire Bay Area by the 1982 Bay Area Air Quality Plan. As CO concentrations in downtown San Francisco are almost entirely due to motor vehicles, future CO levels are predicted to be lower than they would be without an I/M program. Thus, actual concentrations are

TABLE 9: PROJECTED DAILY POLLUTANT EMISSIONS

Pollutant	Emissions (tons per day) /a/		
	Project 2000/b/	Downtown Plan 2000/c/	Bay Area 2000/d/
Hydrocarbons	0.005	0.6	560
Nitrogen Oxides	0.006	0.8	492
Carbon Monoxide	0.044	6.6	2,170
Particulates	0.006	1.3	764
Sulfur Oxides	0.001	0.1	225

/a/ Project and Downtown Plan emissions calculated using BAAQMD vehicle emission factors which do not take into account the inspection and maintenance program. Emissions of HC, NO_x, and CO include an assumed six minutes of idling time per vehicle trip. Emissions of TSP include dust disturbed from roadway surfaces.

/b/ Based upon a weighted daily average of 13.5 miles traveled.

/c/ Incremental emissions of C-3 District development, per The Downtown Plan EIR, Vol 1, Table IV.1.2, p. IV.I.12.

/d/ Air Quality and Urban Development, Guidelines for Assessing Impacts of Project and Plans, November 1985, prepared by the Planning Division of the Bay Area Air Quality Management District.

SOURCE: Environmental Science Associates, Inc. and Downtown Plan EIR.

expected to be lower than CO and HC emissions shown in Table 9, because the Downtown Plan EIR did not take the I/M program into account. The project would contribute about one percent to the total emissions generated by Downtown Plan development, in 2000.

Emissions of total suspended particulates (TSP) resulting from construction and from vehicle trips generated by the project and cumulative development would increase TSP concentrations, which could increase the frequency of TSP standard violations in San Francisco, with concomitant health effects and reduced visibility./1/

The 1982 Bay Area Air Quality Plan contains strategies which consist primarily of HC and CO emission controls on stationary sources and motor vehicles, and transportation improvements, and are aimed at attaining the federal ozone and CO standards. Emissions

associated with the project and with cumulative downtown development under the Downtown Plan are not projected by this EIR or the Downtown Plan EIR to increase ozone concentrations, and thus would not conflict with the objectives of the 1982 Bay Area Air Quality Plan regarding ozone. Cumulative downtown development is projected by the Downtown Plan EIR potentially to result in a violation of the eight hour CO standard at the Brannan/Sixth intersection as analyzed therein. Using the revised emission factors which account for the I/M program in the revised version of MLR contained in the Downtown Plan EIR, the City no longer predicts violations of CO standards at the Sixth and Brannan intersection, or other intersections which have been modeled in the greater downtown. Based on the above, cumulative downtown development would not conflict with objectives of the 1982 Bay Area Quality Plan regarding CO.

NOTE - Air Quality

/1/ State particulate standards were changed in 1983 to concentrate on fine particulate matter which has been demonstrated to have health implications when inhaled. Until the State adopts a method for monitoring fine particulate matter, it is not possible to determine what proportion of TSP in San Francisco would be subject to review against the new standards, whether new standards would be violated, or what the health implications would be.

G. CONSTRUCTION NOISE

Construction noise impacts are discussed in the Initial Study prepared for the project (see p. A-14 to p. A-17). The Initial Study/EIR Requirement determined that no further study of this topic was required. Subsequent to publication of the Initial Study, it was determined that construction noise as it might relate to the Nam Kue School, required further analysis. The results of that analysis are presented here.

Ambient noise in the project vicinity is typical of noise levels in downtown San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses and emergency vehicles. Sidewalk noise measurements taken during the weekday p.m. peak commute time show average noise levels of about 75 dBA L_{eq} on the corner of Sacramento and Kearny Sts./1,2/ The Downtown Plan EIR indicates day-night average noise levels (L_{dn}) of about 76 dBA along Kearny St. and 73 dBA along Sacramento St. in the vicinity of the project./3/

As noted in the Initial Study on p. A-16, project construction would take place over about 24 months, and would increase noise levels in surrounding areas. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers between noise source and listener. To estimate probable noise impacts, this analysis assumes typical equipment and construction techniques. Table 10, p. 131, shows typical exterior noise levels associated with the different phases of construction (see Appendix E, p. A-60, for a table of typical noise levels found in the everyday environment). Interior noise levels at 50 ft. from the noise source would be about 10 to 15 dBA less than those shown in Table 10. Closed windows would reduce noise levels by about 15 to 25 dBA below those shown in the table.

As noted in the Initial Study, construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the City Police Code).

Project construction would take place in several stages: demolition and clearance, excavation, foundation preparation, frame erection, and exterior finishing. Throughout the construction period there would be truck traffic to and from the site, initially hauling away debris and dirt and then delivering building materials. The project would not require pile driving.

Most structures in the project vicinity are office buildings, except buildings across Sacramento St., about 70 feet west of the project site, where residential units occupy the upper floors on the north side of Sacramento St., and the Nam Kue school, on the south side of Sacramento St., about 70 ft. west of the site's west property line. During

- excavation and exterior finishing, noise levels inside the school and in these residential units could reach 66 dBA with windows open and 61 dBA with windows closed; exterior noise levels would be about 76 dBA./4/ Noise at levels greater than 55 dBA (for children) 60 dBA (for adults) can interfere with normal speech and concentration; noise levels greater than 65 dBA (for children) or 70 dBA (for adults) would require workers, residents, and students and teachers in the school to close windows or raise their voices to communicate. Classroom operations can be affected in a noise environment greater than 55 dBA; the noise renders intelligibility difficult and causes distraction./5/ Classes are held at the Nam Kue school, Monday through Friday from 4 p.m. to 6 p.m./6/ There is an outdoor play area at the southern boundary of the school; it is approximately 45 ft. by 25 ft., and is surrounded by adjacent buildings. Outdoor noise levels in the play area could

TABLE 10: TYPICAL COMMERCIAL/INDUSTRIAL CONSTRUCTION NOISE LEVELS AT 50 FEET FROM THE SOURCE

<u>Construction Phase</u>	<u>Duration of Phase/a/ (months)</u>	<u>Average (Energy Equivalent) Noise Level (L_{eq} in dBA)</u>
Ground Clearing	3	84
Excavation	5	89
Foundations	1	78
Steel Erection	3	85
Exterior Finishing	12	89

/a/ Mike Ford, Swinerton and Walberg, Co., letter May 7, 1986.

SOURCE: Bolt, Beranek and Newman, December 31, 1971, Noise from Construction Equipment and Home Appliances, U.S. Environmental Protection Agency.

reach as high as 76 dBA, (including a 10 dBA reduction for intervening building noise attenuation). Some project noise might be audible if construction were to occur during school hours; it would probably not be disruptive, as existing noise levels are about 73 dBA, L_{dn} . According to the Downtown Plan EIR (EE81.3) the background noise level (L_{dn}) on this section of Sacramento St. was 73 dBA in 1984 and would be 73 dBA in 2000./3/

No additional developments are planned in the project area that would coincide with the construction schedule of the proposed project. In summary, during the majority of construction activity, noise levels would be expected to be above existing levels in the area. There would be times, particularly during the operation of impact wrenches, when noise would interfere with indoor activities in the Nam Kue school on Sacramento Street, if construction were to occur during school hours (see also the Initial Study, pp. A-16 to A-17 for noise affects on adjacent residential and office uses).

For mitigation measures, to reduce construction noise impacts of the project, see the Initial Study p. A-33 and the Mitigation Chapter pp. 146 to 147.

In addition to these measures to reduce construction noise, the sponsor would hire an acoustical expert to monitor the interior noise levels of the Nam Kue School, on one

occasion, to determine which equipment would result in an interior noise level in excess of 55 dBA with windows closed; use of such equipment would be prohibited between 4 p.m. to 6 p.m., work days, when classes are in session, as part of the construction contract (see Mitigation Measures p. 146).

NOTES – Construction Noise

/1/ Noise measurements were taken on Tuesday, September 17, 1986 at 4:30 to 4:45 p.m. with a Metrosonics db-306A Metrologger with calibration prior to each measurement by ESA. Measurement location was on the sidewalk on the southwestern corner of Kearny at Sacramento St.

/2/ dBA is a measure of sound in units of decibels (dB). The "A" denotes the A-weighted scale, which simulates the response of the human ear to various frequencies of sound. L_{eq} , the equivalent noise level, is the average energy content of the noise over a given time period. L_{dn} , the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noises; noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than daytime noise.

/3/ San Francisco Department of City Planning, Downtown Plan Environmental Impact Report (EIR), EE81.3, certified October 18, 1984, Volume 1, pp. IV.J.1-19, particularly Table IV.J.2, pp. IV.J.9-10.

/4/ These calculations assume a 3 dBA attenuation due to distance, a 10 dBA attenuation due to intervening buildings and an additional ten to 15 dBA reduction for indoor noise levels.

/5/ Information on Levels of Environmental Noise Requisite of Project Public Health and Welfare with an adequate Margin of Safety, U. S. Environmental Protection Agency, March 1974.

/6/ Tsung P. Tsho, Principal, Nam Kue School, interview September 17, 1986.

H. EMPLOYMENT

EXISTING EMPLOYMENT

Approximately 373 employees currently work at the project site, of which 368 are employees of the Federal Home Loan Bank of San Francisco, the project sponsor./1/ Employees include office, retail/service, garage and maintenance workers. Table 11, p. 133, identifies the gross floor area by use and tenants currently on-site. Almost all of the total existing office area on-site is occupied by the Federal Home Loan Bank; the remainder is occupied by Hertz Rent-A-Car.

Direct Project-Related Employment

The project would accommodate growth of office and retail employment in the C-3 District. The Federal Home Loan Bank would occupy a majority of the project office, space; it is expected that office businesses providing management, technical, and professional services would occupy any remaining portion of the space. No tenants have been secured. Over time, the project is expected to be characteristic of all C-3 District office buildings occupied by a mix of corporate and business service firms.

Therefore, average overall density factors for the C-3 District (gsf of space per employee) are used to estimate the employment characteristics of the project, as opposed to using any particular tenants which may or may not remain in the building over the long term.

Demolition for construction of the new project would result in the displacement of the existing Hertz Rent-A-Car business and employees. Existing Federal Home Loan Bank employees would be temporarily relocated to another building which is as yet undetermined.

In total, there would be about 1,220 workers at the project site, consisting of 1,167 office workers, 23 retail workers, 26 building maintenance/security workers and four parking garage attendants (see Table 11, p. 133). The additional space represented by the project would accommodate about 847 additional employees in the C-3 District. There would be a net increase of about 798 office employees, a net increase of about 23 retail employees, and a net increase of about 26 building maintenance/security employees; the number of parking garage attendants would remain the same.^{2/} The difference between the estimate of total employment and the estimate of additional employment is accounted for by the demolition of the existing space on the project site.

Total permanent employment in the C-3 District is forecast to be about 372,000 in the year 2000 under the Downtown Plan. This forecast represents an increase of about 90,000 C-3 District workers between 1984 and 2000. Total employment in the project would represent about 0.3% of total C-3 District employment in 2000. The additional C-3-District employment accommodated in the project would represent about 0.2% of total C-3 District employment in 2000 and about one percent of the forecast growth in permanent employment.

TABLE 11: EXISTING USES AT PROJECT SITE AND ESTIMATES OF PROJECT EMPLOYMENT

<u>Address</u>	<u>Tenant</u>	<u>Use</u>	<u>Gross Floor Area (square feet)</u>	
			<u>Office</u>	<u>Parking</u>
EXISTING USES				
600 California	Federal Home Loan Bank of San Francisco	Bank (office with basement parking)	95,800	8,386
533 Kearny	Hertz Rent-A-Car	Office	800	-
551 Kearny	Federal Home Loan Bank of San Francisco	Parking Garage	-	60,000
TOTAL			<u>96,600</u>	<u>68,386</u>
TOTAL PROJECT EMPLOYMENT				
<u>Use</u>		<u>Building Space</u>	<u>Space per Employee /a/</u>	<u>Estimated Employment</u>
Office		312,700	268 /b/	1,167
Retail		7,900	350	23
Sub-Total		320,600		1,190
Building Maintenance/Security		320,600	12,500	26
Parking Garage		<u>90,600</u>	--	<u>4 /c/</u>
TOTAL		<u>411,200</u>		<u>1,220</u>

NET ADDITIONAL EMPLOYMENT				
<u>Use</u>		<u>Existing Employment</u>		<u>Net Additional Employment</u>
Office		369 /d/		789
Retail		--		23
Sub-Total		<u>369</u>		<u>821</u>
Building Maintenance/Security		--		26
Parking Garage		<u>4</u>		<u>--</u>
TOTAL		<u>373</u>		<u>847</u>

/a/ Gross sq. ft. of building space per employee. C-3 District employment density factors from Downtown Plan EIR, EE81.3, certified October 18, 1984. (see note /2/ at end of section.)

/b/ Density for all office activities in 2000, including both management/technical office and trade/customer service office, and incorporating an average 5% vacancy factor.

/c/ The proposed parking garage would be self serve and would maintain the same number of attendants as the existing garage.

/d/ 364 persons work for the Federal Home Loan Bank, and five persons work for Hertz Rent-A-Car at present.

SOURCE: Federal Home Loan Bank, and ESA

About 2,000 additional jobs in the Bay Area would result from the employment multiplier effect of project operation. Construction of the new project would require about 130 person-years of construction labor. Construction labor for the project would represent about 0.2% of the total person-years of construction labor forecast for the C-3 District from 1984 through 2000. About 220 additional person-years of employment would be generated in the Bay Area, as a result of the multiplier effect of project construction./3/

The forecast of cumulative C-3-District employment to the year 2000 (of which the proposed project employment is a part) consists of both "basic" economic growth (activities supported by sales to buyers outside the area) as well as the part of the "multiplier" of this growth that occurs in the C-3 District. The multiplier is the economic growth that results from business purchases and the spending of employees and employee households. The project could include both businesses that generated additional C-3-District economic activity and businesses that were part of the multiplier effect of other C-3-District activities.

In addition to the part of the multiplier effects that occurs in the C-3 District, there would be other economic activity generated by business and employee household spending elsewhere in the City and the rest of the region.

NOTES - Employment

/1/ Information on number of employees provided by the Federal Home Loan Bank of San Francisco, September 15, 1986, Raymond Terwilliger, Jr., copy of letter is on file with the Department of City Planning, 450 McAllister St.

/2/ Employment in the project is calculated from the estimates of space by use in the project using employment density factors (gross sq. ft. of space per employee). The employment density factors are those developed in the analysis for the Downtown Plan EIR. (See Downtown Plan EIR, Table IV.C.2, p. IV.C.6 and Table H.3, pp. H.21-H.22.) The office employment density factor used here (268 gross sq. ft. per employee) is for total C-3 District office in the year 2000, including both management/technical office and trade/customer service office business activities. It is different from the density factor of 255 gross sq. ft. of occupied space per employee described in the Downtown Plan EIR (see p. IV.C.45), however, because it incorporates an average office vacancy rate of five percent. (See Downtown Plan EIR, note 7, pp. IV.C.55-IV.C.56). This density factor (as well as the other for occupied space) is consistent with the Downtown Plan EIR forecasts of employment and space which incorporate an average office vacancy rate of 5%.

The year 2000 density factors are used so the project can be set in the context of cumulative C-3 District development to 2000. Under the Downtown Plan, office employment densities are expected to increase over time as businesses take steps to use space more efficiently when faced with higher rents. This is reflected in the office employment density used in this EIR. (See Downtown Plan EIR, pp. IV.C.45 and notes 28, 29 and 30, pp. IV.C.60-IV.C.61.)

/3/ Indirect employment projections are based on A 1980 Hybrid Input-Output Model for the San Francisco Bay Region, Association of Bay Area Governments, April 1984. The multipliers used are averages of the employment multipliers contained in that model.

I. RESIDENCE PATTERNS AND HOUSING

The following paragraphs summarize material from the Downtown Plan EIR. This summarized material is found on the following pages of the Downtown Plan EIR which are incorporated by reference:

Volume I: Final EIR text. Pages IV.D-40 through 98

Volume II: Appendices. Appendix I

Volume III, Part 1: Responses. Section D

Housing Market Impacts

The Downtown Plan EIR analyzed the effects of C-3 employment growth on future housing market conditions. That analysis was based on the forecasts of C-3 district and citywide employment growth as estimated by City consultants, considered in the context of regional population growth, regional employment growth, demographic changes including changes in household composition and labor force participation, and an increased housing supply, all as projected by ABAG. Growth in C-3 employment would result in more households with more income to pay for housing, adding to already strong demand for housing in San Francisco. With forecast C-3 district employment growth, there would be approximately 30,000 more C-3 district workers living in San Francisco. While there would be an increase in San Francisco's housing supply, the private market is expected to be unable to supply much new housing that would be affordable to a large segment of the City's population.

The age distribution of the population, household sizes and incomes, mobility and migration, lifestyle preferences, land availability, land use policies, construction costs and general economic conditions will also have implications for the housing market. As a result of these factors, as well as employment growth in the C-3 district, housing in San Francisco is expected to remain more costly relative to household incomes than it has been in the past. Some new C-3 district employees would decide not to move to the City, and some existing City residents would move out of the City, for a variety of reasons only

one of which would be higher housing costs. As a result of San Francisco's continuing high housing costs, some people would pay more for the same quality housing, and others would end up with lower quality housing; many would allocate a larger share of their resources for housing. Generally, these impacts would result in the greatest sacrifices from those households with fewer financial resources.

Residence Patterns

The C-3 district contains the greatest concentrations of the types of jobs most likely to be filled with workers who commute from outside of San Francisco. However, C-3 district workers did not represent large percentages of the total number of employed residents of the other Bay Area counties in 1980/1981, and these percentages are expected to be very similar, although somewhat larger, in 2000. As shown on Table IV.D.20, page IV.D.81h of the Downtown Plan EIR, 6.7% of all employed Alameda County residents in 1980/1981 worked in the C-3 district. This would change to 7.8 to 7.9% in 2000. Marin County has the highest concentration of C-3 district workers: 13.7% of employed Marin County residents work in the C-3 district. This figure would grow to 15.2 to 16.1% in 2000. Santa Clara County has the lowest concentration of C-3 district workers: 0.3% of employed Santa Clara County residents are work in the C-3 district. This percentage is not expected to change in 2000.

Because C-3 district employment growth is one of many factors affecting future housing market conditions, and because the increased numbers of C-3 district employees residing outside of San Francisco, when considered in the regional context of employment growth, are not great, the City Planning Commission, in certifying the Downtown Plan EIR, did not find a significant impact on the region's housing supply as a result of cumulative downtown growth.

J. GROWTH INDUCEMENT

The project would include about 312,700 gross sq. ft. of office space (a net increase of about 216,100 gross sq. ft.) and about 7,900 sq. ft. of retail where there is now none. Employment at the site would increase from about 373 to about 1,220 people, an increase of about 847. The Federal Home Loan Bank of San Francisco would occupy the majority of the proposed building area. Occupants of the remaining portion of the proposed project

are not known, but could include tenants expanding or relocating from other San Francisco locations, tenants relocating from outside San Francisco, and firms new to the Bay Area. The increase in employment at the project site, therefore, would not necessarily represent employment that is new to San Francisco. If the project were fully leased, however, and the office space of the project did not create permanent vacancies in other San Francisco office buildings, total employment in San Francisco could increase by about 847 jobs due to the project. Additional jobs also would be supported indirectly in San Francisco through the multiplier effect./1/

If marketed successfully, the project, together with other planned office development, could have growth-inducing effects by demonstrating a market for office space in this area. This could thereby encourage similar development on lots (including smaller lots assembled for development) currently occupied by low- or mid-rise buildings containing business support services. Such a demand would reflect the trend of growth in service sector and headquarters office activities and employment in San Francisco. Increases in downtown office space and employment would contribute to continued growth of local and regional markets for housing, goods, and services. These effects would be less extensive were the vacancy rate for office space to continue to rise. Should this occur, projected increases in downtown employment would be less and the growth in demand for goods, services and housing would be lower.

It is expected that some downtown workers, including some in the project, would want to live in San Francisco. Employment growth, however, would not be reflected directly in increases in demand for housing and city services to residents, as some new jobs would be held by individuals who already live and work in the City; who live in the City but previously either did not work, or worked outside the City; who live in surrounding communities; or by those unable to afford or locate housing in the City. New downtown workers would also increase demand for housing in other parts of the Bay Area.

Any net increase in employment downtown would increase the demand for retail goods and services in the area. The project would intensify this demand by increasing the amount of employment on the site. Increases in employment downtown would also increase demand for business services, to the extent that the expanded space would not be occupied by firms providing those services. In response, demand would increase for existing space and possibly for further new development. The project would provide 7,900 sq. ft. more retail than now on the site; there is now none.

The project would be built in a developed urban area, and no expansion to the municipal infrastructure not already under consideration would be required to accommodate new development and increased employment due to, or induced by, the project.

NOTE - Growth Inducement

/1/ Indirect employment projections are based on A 1980 Hybrid Input-Output Model for the San Francisco Bay Region, Association of Bay Area Governments, April 1984. The multipliers used are averages of the employment multipliers contained in that model.

V. MITIGATION MEASURES

In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. Some of these measures have been, or would be, adopted by the project sponsor or project architects and contractors and thus are proposed; some are under consideration; and some have been rejected. Implementation of some may be the responsibility of public agencies. Measures under consideration or measures rejected by the sponsor may be required by the City Planning Commission as conditions of project approval.

Each mitigation measure and its status are discussed below. Where a measure has not been included in the project, the reasons for this are discussed.

Mitigation measures below preceded by an asterisk (*) are from the Initial Study (see Appendix A, p. A-2 to A-41).

VISUAL QUALITY

MEASURE PROPOSED AS PART OF THE PROJECT

- *- In order to reduce obtrusive light or glare, the project sponsor would use no mirrored glass on the building.

CULTURAL RESOURCES

MEASURES PROPOSED AS PART OF THE PROJECT

- The sponsor would retain the services of an archaeologist. The Environmental Review Officer (ERO) in consultation with the President of the Landmarks Preservation Advisory Board (LPAB) and the archaeologist, would determine whether the archaeologist should instruct all excavation and foundation crews on the project

site of the potential for discovery of cultural and historic artifacts, and the procedures to be followed if such artifacts are uncovered.

Given the strong possibility of encountering the remains of cultural or historic artifacts within the project site, prior to the commencement of foundation excavations the project sponsor would undertake a program of archaeological testing. This would consist of observation and monitoring by a qualified historical archaeologist of site clearance of at least any materials below existing grade level, and either the placement of a series of mechanical, exploratory borings or other similar on-site testing methods. The archaeologist would supervise the testing at the site to determine the probability of finding cultural and historical remains. At the completion of the archaeological testing program, the archaeologist would submit a written report to the ERO, with a copy to the project sponsor, which describes the findings, assesses their significance and proposes appropriate recommendations for any additional procedures necessary for the mitigation of adverse impacts to cultural resources determined to be significant.

An historical archaeologist would be present during site excavation and would record observations in a permanent log. The ERO would also require cooperation of the project sponsor in assisting such further investigations on site as may be appropriate prior to or during project excavation, even if this results in a delay in excavation activities.

In addition, a program of on-site construction monitoring by a qualified historical archaeologist, designed to allow for the recovery of a representative sample of the cultural materials existing on the site, would be implemented by the project sponsor. This monitoring and recovery program would result in a written report to be submitted to the ERO, with a copy to the project sponsor.

Should cultural or historic artifacts be found following commencement of excavation activities, the archaeologist would assess the significance of the find, and immediately report to the ERO and the President of the LPAB. Upon receiving the advice of the consultants and the LPAB, the ERO would recommend specific mitigation measures, if necessary. Excavation or construction activities following the preconstruction archaeological testing program which might damage the

discovered cultural resources would be suspended for a maximum of four weeks (cumulatively for all instances that the ERO has required a delay in excavation or construction) to permit inspection, recommendation and retrieval, if appropriate.

- Following site clearance, an appropriate security program would be implemented to prevent looting. Any discovered cultural artifacts assessed as significant by the archaeologist upon concurrence by the ERO and the President of the LPAB would be placed in a repository designated for such materials. Copies of the reports prepared according to these mitigation measures would be sent to the California Archaeological Site Survey Office at Sonoma State University.

WIND

MEASURE PROPOSED AS PART OF THE PROJECT

- The project would be designed to include wind walls, deflectors, baffles, trellises or other features or devices to reduce wind speeds on the proposed rooftop open space to seven mph (the comfort criterion for public seating areas established in Section 148 of the Downtown Plan). The open space would be enclosed, if necessary, if the standard could not be met outdoors. The design of the selected wind mitigation features would be based upon wind tunnel tests to be conducted for several locations on the proposed rooftop open space; the test locations would be subject to approval by the Department of City Planning. The final wind reduction measures would be subject to City approval.

TRANSPORTATION

MEASURES PROPOSED AS PART OF THE PROJECT

- During the construction period, construction truck movement would be permitted only between 9 a.m. and 3:30 p.m. (that is, not between 7 a.m. to 9 a.m. and 3:30 p.m. to 6 p.m.), to minimize peak-hour traffic conflicts and to accommodate queueing of Muni buses prior to the peak hours. The project sponsor and construction contractor would meet with the Traffic Engineering Division of the Bureau of Engineering of the Department of Public Works, the Fire Department, Muni and the Department of City

Planning to determine feasible traffic mitigation measures to reduce traffic congestion during construction of this project and any other nearby projects. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction or later become known.

- The project sponsor would contribute funds for maintaining and augmenting transportation services in an amount proportionate to the demand created by the project, as provided by the Board of Supervisors Ordinance Number 224-81. Should said Ordinance be declared invalid by the courts, the project sponsor has agreed to participate in any subsequent equivalent mitigation measures adopted by the Planning Commission or the City in-lieu thereof, which would apply to all projects similarly situated.
- Within a year of full occupancy of the project, the sponsor would conduct a survey, in accordance with methodology approved by the Department of City Planning, to assess actual trip generation patterns of project occupants and actual pick-up and drop-off areas for carpools and vanpools. The project sponsor would make this survey available to the Department. This measure would provide needed information to aid in transportation planning within the City.
- The project sponsor shall: 1) participate with other project sponsors and/or the San Francisco Parking authority in undertaking studies of the feasibility of constructing an intercept commuter parking facility in a location appropriate for such facility to meet the unmet demand for parking for those trips generated by the project which cannot reasonably be made by transit, and 2) participate with other project sponsors and/or the Municipal Railway in studies of the feasibility of the establishment of a shuttle system serving the project site and the parking facility.
- As required by Section 163 of the City Planning Code, a member of the building management staff would be designated as a transportation broker to coordinate measures that are part of a transportation management program, such as: encouraging a flexible time system for employee working hours (to be developed by project tenants in consultation with the Department of City Planning) to reduce peak-period congestion by a planned spreading of employee arrivals and departures;

encouraging transit use through the on-site sale of BART, Muni, and other carriers' passes to employees; and encouraging employee carpool and vanpool systems in cooperation with RIDES for Bay Area Commuters by providing a central clearinghouse for carpool and vanpool information.

- Secure, safe bicycle storage facilities would be provided relative to the demand generated by project commuters and short-term visitors.
- Building directories and signs for the service elevators would be placed in the loading area.
- The placement of paving, landscaping or structures in the sidewalk area (subject to City approval) would be done in such a way as to minimize interference with pedestrian traffic.
- Off-street parking spaces would be controlled to assure priority for vehicles driven by the physically handicapped, and vanpool and carpool vehicles.
- The project would include a turntable for vehicles using the freight loading spaces. The turntable would facilitate off-loading and would permit trucks to exit on to Sacramento St. in forward motion.

MEASURE UNDER CONSIDERATION BY PROJECT SPONSOR

- The parking driveways could include warning devices (lighted signs and noise-emitting devices) to alert pedestrians to vehicles exiting the structure. The sponsor will make a decision on this measure during final design stage based on design criteria and cost.

MEASURE REJECTED BY THE PROJECT SPONSOR

- ● The project sponsor could, in consultation with the Municipal Railway, install eyebolts or make provisions for direct attachment of eyebolts for Muni trolley wires on the proposed building, wherever necessary, or agree to waive the right to refuse the attachment of eyebolts to the proposed building if such attachment is done at City expense. The sponsor prefers not to have Muni eyebolts attached to the proposed building because, in his opinion, they are unattractive and would detract from the aesthetic quality of the building.

MEASURES THAT COULD BE IMPLEMENTED BY PUBLIC AGENCIES

- Pacific Gas and Electric Company could coordinate work schedules with other utilities requiring trenching, so that street disruption would take place during weekends and off-peak hours. This should be done through the San Francisco Committee for Utility Liaison on Construction and Other Projects (CULCOP). In-street utilities could be installed at the same time as the street is opened for construction of the project to minimize street disruption.
- The City could implement the transportation improvements described in the Downtown Plan. Cumulative transportation impacts within San Francisco would be reduced by the improvements, and, to the extent that San Francisco could influence transportation improvements recommended by the Plan for areas outside the City, regional cumulative impacts caused by downtown growth would also be reduced.
- The City could act to implement the transportation mitigations described in Vol. 1, Section V.E., Mitigation, pp. V.E.4-28, in the Downtown Plan EIR. These measures are similar or identical to those in the Downtown Plan and include, in summary: measures to construct and maintain rail rapid transit lines from downtown San Francisco to suburban corridors and major non-downtown centers in San Francisco; measures to fund Vehicle Acquisition Plans for San Francisco and regional transit agencies to expand existing non-rail transit service; provide exclusive transit lanes on City streets and on freeways; reduce incentives to drive by reducing automobile capacities of bridges and highways in certain circumstances and by discouraging long-term parking; measures to encourage carpools, vanpools, and bicycle use; and measures to improve pedestrian circulation within downtown San Francisco. Some of the Implementing Actions would require approval by decision-makers outside the City and County of San Francisco; many of the measures would require action by City agencies other than the City Planning Commission, such as the San Francisco Public Utilities Commission and/or Board of Supervisors. These measures are system-wide measures that must be implemented by public agencies. Other than project-specific measures such as the relevant transportation mitigation measures described above as part of the project or such as the Transit Impact Development Fee assessment required by San Francisco ordinance 224-81 which contribute indirectly to implementation of these system-wide measures, it is not appropriate to impose mitigation at system-wide levels on individual projects.

AIR QUALITY

MEASURES PROPOSED AS PART OF THE PROJECT

- *- The project sponsor would require the general contractor to sprinkle demolition sites with water continually during demolition activity; sprinkle unpaved construction areas with water at least twice per day to reduce dust generation by about 50%; cover stockpiles of soil, sand, and other materials; cover trucks hauling debris, soils, sand or other such material; and sweep streets surrounding demolition and construction sites at least once per day to reduce TSP emissions. The project sponsor would require the general contractor to maintain and operate construction equipment so as to minimize exhaust emissions of TSP and other pollutants by such means as a prohibition on idling motors when equipment is not in use or trucks are waiting in queues, and implementation of specific maintenance programs (to reduce emissions) for equipment that would be in frequent use for much of the construction period.

NOISE

MEASURES PROPOSED AS PART OF THE PROJECT

- *- The project sponsor would require the project contractor to muffle and shield intakes and exhaust, shroud or shield impact tools, and use electric-powered, rather than diesel-powered, construction equipment, as feasible, so that noise would not exceed limits stated in the City's Noise Ordinance (Article 29, San Francisco Administrative Code, 1972).
- *- The project sponsor would require the general contractor to construct barriers around the site and stationary equipment such as compressors, which would reduce construction noise by as much as five dBA, and to locate stationary equipment in pit areas or excavated areas as these areas would serve as noise barriers.
- *- As recommended by the Environmental Protection Element of the San Francisco Master Plan, an analysis of noise reduction measurements would be prepared by the project sponsor and recommended noise insulation features would be included as part of the proposed building. For example, such design features would include fixed windows and climate control.

- The sponsor will hire an acoustical expert to visit the Nam Kue school (on one occasion) to monitor the interior noise levels of the school to determine which equipment would result in an interior noise level in excess of 55 dBA with windows shut; use of such equipment would be prohibited between 4 p.m. to 6 p.m. weekdays (when classes are in session).

GEOLOGY/TOPOGRAPHY

MEASURES PROPOSED AS PART OF THE PROJECT

- *- A detailed foundation and structural design study would be conducted for the building by a California-licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design, excavation and construction of the project.
- *- If dewatering were necessary, any groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Division of the Department of Public Works, to reduce the amount of sediment entering the storm drain/sewer lines.
- *- Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the soils report would contain a determination as to whether or not a lateral and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Groundwater observation wells would be installed to monitor the level of the water table and other instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable subsidence were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Cost for the survey and any necessary repairs to service under the street would be borne by the project sponsor.

WATER QUALITY

- *- See the second measure under Geology/Topography, above, for mitigation proposed to prevent sedimentation from entering storm sewers.

ENERGY

PROPOSED AS PART OF THE PROJECT

- *- The project would meet the energy requirements of the State Administrative Code Title 24, Part 6, Article 2. Energy Conservation Standards for New Non-Residential Buildings.

MEASURES UNDER CONSIDERATION BY PROJECT SPONSOR

Depending on the final design and energy requirements of the project, the sponsor is considering the following additional conservation measures:

- *- Use of natural gas for space and hot water heating.
- *- Multiple light-switching; a variable air volume air conditioning system; and an outside-air/return-air economizer cycle.
- *- A carbon monoxide monitoring system to control garage ventilation and avoid unnecessary operation of fans.
- *- A water economizer cycle system using condenser water to generate chilled water could be installed so that in hot weather the heat exchangers would cool the water without using excessive amounts of electricity.
- *- The project could incorporate low-flow plumbing to conserve electricity.
- *- Fluorescent lights with parabolic diffusers could be used to conserve energy and reduce glare. Return-air diffuser slots in light fixtures could reduce air conditioning loads by removing part of the heat generated by light fixtures. Whenever possible, office suites could be equipped with individualized light switches, and time clock operation to conserve electrical energy.

- *- The sponsor could perform a thorough energy audit of the structure's actual energy use after the first year of occupancy, implement all cost-effective alterations to the structure's energy system identified in the audit, and make results of the audit available to the City.

HAZARDS

MEASURES PROPOSED AS PART OF THE PROJECT

- *- An evacuation and emergency response plan would be developed by the project sponsor or building management staff, in consultation with the Mayor's Office of Emergency Services to insure coordination between the City's emergency planning activities and the project's plan and to provide for building occupants in the event of an emergency. The project plan would be reviewed by the Office of Emergency Services and implemented by building management insofar as feasible before issuance of final building permits by the Department of Public Works.
- *- To expedite implementation of the City's emergency response plan, the project sponsor would prominently post information for building occupants concerning what to do in the event of a disaster.

UTILITIES / PUBLIC SERVICES

MEASURE PROPOSED AS PART OF THE PROJECT

- The project would include on-site storage for trash containers in the basement. Containers would not be placed on streets or sidewalks except during actual trash pickup.

MEASURE UNDER CONSIDERATION BY PROJECT SPONSOR

- The project could provide containers to collect and store recyclable solid waste (such as glass, metal, computer cards, and newspaper) and the project sponsor could contract for recycling service. The project sponsor will make a decision about this measure during final building design based on cost effectiveness.

● VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

This chapter identifies significant impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, as described in Chapter V., Mitigation Measures, pp. 140 to 149.

No project-specific significant impacts have been identified. Mitigation measures included as part of the project are described in Chapter V., Mitigation Measures, pp. 140 to 149.

Cumulative development in downtown San Francisco would have a significant effect on the environment in that it would generate cumulative traffic increases as well as cumulative passenger loadings on Muni, BART and other regional transit carriers. These cumulative transportation impacts could cause violations of the total suspended particulate (TSP) standard in San Francisco with concomitant health effects and reduced visibility. The proposed project would contribute to these cumulative effects.

VII. ALTERNATIVES TO THE PROPOSED PROJECT

This chapter identifies alternatives to the proposed project, discusses environmental impacts associated with these alternatives, and gives the reasons the alternatives were rejected in favor of the project. Regardless of the sponsor's reasons for rejection, the City Planning Commission could approve an alternative instead of the proposed project if the Commission believed the alternative would be more appropriate for the site. See

- Table 12, p. 164 for a summary comparison of the project with Alternatives B, C, D, E1, E2 and F.

A. ALTERNATIVE A: NO PROJECT

DESCRIPTION OF ALTERNATIVE

This alternative would entail no change to the site. The proposed project would not be built there. The existing nine-story office building and three-story parking garage that are proposed to be demolished would be retained.

DISTINCTIVE ENVIRONMENTAL EFFECTS OF ALTERNATIVE

The environmental characteristics of this alternative would be generally as described in the Environmental Setting sections of this report (see Chapter III, Setting, pp. 35 to 57, for a discussion of existing conditions). Transportation and noise impacts associated with the demolition of the on-site building and parking garage and subsequent project construction, would not occur. Transportation and air quality conditions (described in Chapter IV, Impacts, pp. 59 to 139) as base conditions with cumulative development, but without the project, would exist in the site vicinity. There would be no change in the demand from the site for energy or community services. There would be no potential effects on cultural resources. Employment on the site would not increase (as it would with the project, from about 373 existing to about 1,220 jobs). Revenues from, and costs of, the project would not result. Land uses, site views, shadows and winds would not change. The increase in parking demand and the replacement of existing parking supply that would result with the project would not occur.

This alternative could result in the development of other office space, possibly a high-rise building comparable to the project, at another location. Alternative development within the San Francisco downtown area would result in many of the same impacts as described for the project. The effects of development would depend largely on the location chosen and cannot be accurately determined. This alternative would preserve the option to develop a similar or different type of building on the site in the future.

SPONSOR'S REASONS FOR REJECTION

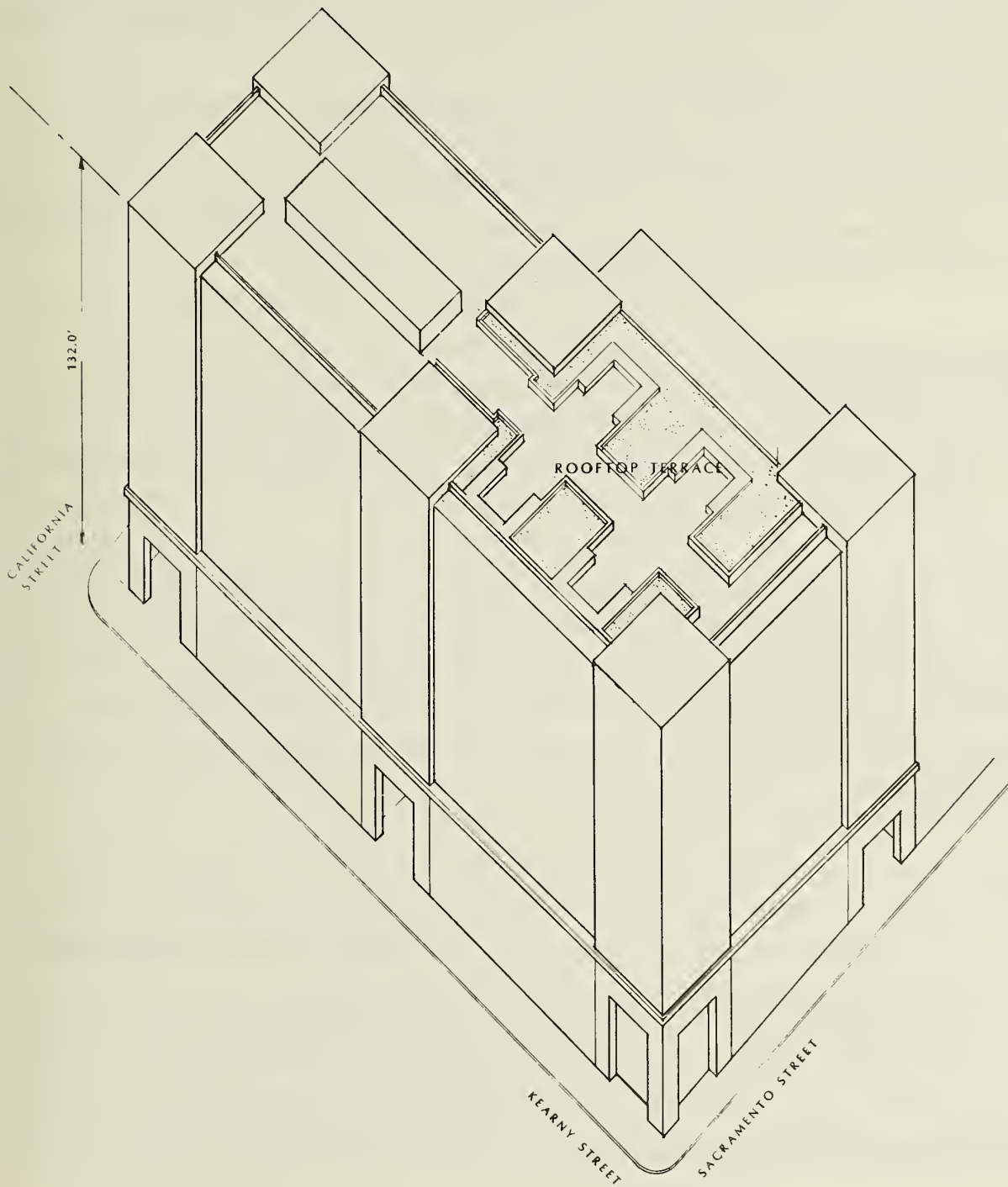
This alternative was rejected by the project sponsor because it would not meet the objectives of the Federal Home Loan Bank and would not use the development potential of the site allowable under the Downtown Plan. Additionally, this alternative would not use Transferred Development Rights (TDR), which promote preservation and restoration of historic buildings in the C-3 District.

B. ALTERNATIVE B: NO TRANSFER OF DEVELOPMENT RIGHTS, 9:1 FAR

DESCRIPTION OF ALTERNATIVE

The project as proposed (with an FAR of about 11:1) would include the transfer of about 65,700 gsf of development rights from as-yet unidentified sites. This alternative considers a building without TDR. The FAR would be 9:1, the basic allowable FAR (see Figure 29, p. 153).

Office space would be 223,500 gsf compared to 312,700 gsf for the project. The building would be ten stories (about 132 ft. tall with a 22 ft. mechanical penthouse) over the entire site compared to a stepped design with 18 stories (about 244 ft. tall) at Sacramento and California Sts., nine stories (about 138 ft. tall) at Kearny and Sacramento Sts. and three stories (45 ft. tall) at the northwest corner for the project. Two loading docks would be provided for this alternative compared to three for the project. Retail area, parking space, and lobby would be the same as with the proposed project (7,900 gsf retail, 90,600 gsf parking). Mechanical space would be 20,100 gsf compared to 21,100 for the project. Open space would be 8,800 sq. ft. compared to 10,400 for the project. Under the Planning Code, the ground floor, retail, circulation and building service areas, would not be applicable to the FAR.



0 FEET 100

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates

FIGURE 29
ALTERNATIVE B: NO TRANSFER OF
DEVELOPMENT RIGHTS, 9:1 FAR

As with the project, parking area up to seven percent of the gross floor area of the building may be considered accessory parking; parking area in excess of seven percent or about 39,300 gross sq. ft. (excluding ramps) may not, and would be applicable to the FAR.

DISTINCTIVE ENVIRONMENTAL EFFECTS OF ALTERNATIVE

This alternative would be about 112 ft. shorter than the project at Sacramento and California Sts. and about six ft. shorter than the project at Kearny and Sacramento Sts.; it would be less visible in mid- and long-range views than the project.

Shadows from this alternative would be about 46% shorter than the project from the California and Kearny Sts. portion of the building, and four percent shorter than the project from the Kearny Sacramento St. portion of the building. Wind effects from this alternative would be greater at 13 of the locations tested, the same at seven locations and less at two locations than the project.

The open space requirement would be met as discussed above. This alternative would comply with the Planning Code requirement for art, as would the project. This alternative would provide employment for about 882 employees, compared to about 1,220 employees for the proposed project. It would generate a demand for about 49 new dwelling units in San Francisco, based on the OAHPP formula, compared to 84 for the proposed project.

Transportation, air quality and energy impacts associated with on-site uses would be about 20% less than those of the proposed project because there would be about 20% less office space than with the project. Construction noise impacts would be experienced for a shorter amount of time, as the construction period would be shorter. Any effect on cultural resources would be the same as for the project, as the depth of excavation would be the same.

SPONSOR'S REASONS FOR REJECTION

The sponsor has rejected this alternative because it would not fully use the development potential permitted for the site under the Downtown Plan and would not use TDR, which promotes restoration and preservation of historic structures in the C-3 District.

C. ALTERNATIVE C: NO PARKING

DESCRIPTION OF ALTERNATIVE

This alternative would have no parking spaces (the project would have 232); other uses, building dimensions, design elements and floor areas would be as for the project. The basement would contain only service/mechanical space, on one level instead of the three basement levels of the project.

DISTINCTIVE ENVIRONMENTAL EFFECTS OF ALTERNATIVE

All impacts of this alternative would be as for the project (land use, urban design, shadow, wind, construction noise, employment and growth inducement), other than traffic and air quality impacts on local intersections which would be less. Traffic impacts on local intersections as a result of the project would not change levels of service at nearby intersections or freeway on-ramps, or measurably affect air quality. This alternative would eliminate on-site parking, compared to the project which would decrease parking from 269 to 232 spaces, and thereby would reduce traffic from the site at local intersections. Unmet parking demand from the alternative would be 232 equivalent spaces greater than that for the project. This alternative would have less potential for disturbance of cultural resources, as one basement level would be needed for this alternative building, rather than three. This alternative would provide employment for about 1,216 new employees compared to 1,220 for the proposed project. All other impacts of this alternative would be as for the project.

SPONSOR'S REASONS FOR REJECTION

The project sponsor has rejected this alternative because it would eliminate existing parking; it would not provide the amenity of on-site parking; it would not meet the demand for increased parking generated by the project (identified in the Transportation section of this EIR); and it would not meet the objectives of the Federal Home Loan Bank.

D. ALTERNATIVE D: NO EXCEPTION TO PLANNING CODE, SEPARATION OF TOWERS OR BULK REQUIREMENTS

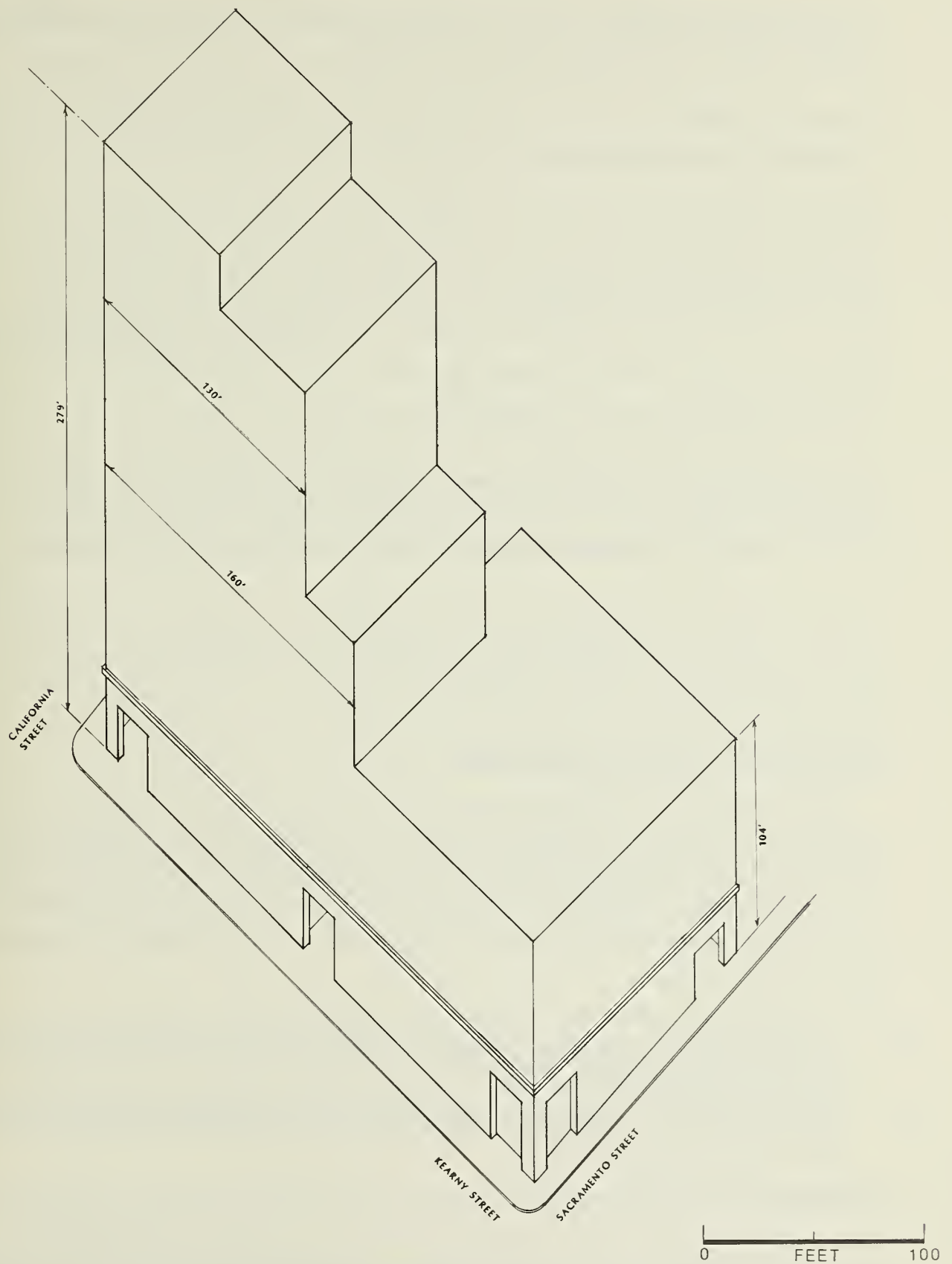
DESCRIPTION OF ALTERNATIVE

This alternative would include setbacks above the base as called for in Section 132.1(c) Separation of Towers (see Figure 30, p. 157). This alternative would be set back above the base 15 ft. from the western interior property line. This alternative would include 317,500 sq. ft. of office, 10,700 sq. ft. of open space, 131,700 sq. ft. of parking, mechanical and other space, and the same area (7,900 sq. ft.) of retail as the project (compared to 312,700 sq. ft., 131,700 sq. ft., and 10,700 sq. ft., respectively, with the project). Also, this alternative would have a maximum length of 160 ft. in the lower tower (compared to 155 ft. for the project), and a maximum length of 130 ft. in the upper tower (compared to 155 ft. for the project); it would have a diagonal dimension of 190 ft. in the lower tower and 160 ft. in the upper tower (compared to 170 ft. for both lower and upper tower for the project); it would have a maximum average floor area of 17,000 sq. ft. in the lower tower and 12,000 sq. ft. in the upper tower (compared to 13,190 sq. ft. and 12,740 respectively for the project), and would have a maximum floor size of 20,000 sq. ft. in the lower tower and 17,000 sq. ft. in the upper tower (compared to 13,190 sq. ft. for both the lower tower and upper tower for the project). This alternative would thus not require an exception to City Planning Code bulk limits. This alternative would have an FAR of about 12:1 (compared to 11:1 for the project) and a maximum height of 279 ft. at the southern portion of the building and 104 ft. at the northern portion of the building (compared to 244 ft. and 138 ft. respectively for the project). Other features of this alternative would be as for the project.

DISTINCTIVE ENVIRONMENTAL EFFECTS OF ALTERNATIVE

This alternative would be taller at California and Kearny Sts. and shorter at Kearny and Sacramento Sts. than the project. It would therefore have greater visibility in mid- and long-range views and less visibility from close-in views from north of the site. The area of retail and parking would be the same as those of the project. Office space would be about two percent greater than with the project. This alternative would require about 83,500 sq. ft. of transferred development rights compared to 65,700 sq. ft. for the project.

Shadow effects would be about 12% greater than those of the project during some times of the year due to the greater height on the southern portion of the building. Wind effects



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates

FIGURE 30
ALTERNATIVE D: NO EXCEPTION TO
PLANNING CODE SEPARATION OF
TOWERS OR BULK REQUIREMENTS

of this alternative would be greater at 14 of the locations tested, the same at three locations and less at four locations than the project.

As would the project, this alternative would comply with City Planning Code requirements for childcare, art and open space.

Off-street loading space standards in the Code would require three spaces for this alternative, which would be provided in the same manner as those of the proposed project. This alternative would include the same number of parking spaces, as the project. The fee structure for all the parking in this alternative would favor short-term parking (the project proposes 48 replacement short-term spaces, 82 long-term and 102 yet to be determined as long- and/or short-term).

This alternative would provide employment for about 1,235 employees, compared to 1,220 employees for the proposed project. It would generate a demand for about 85 new

- dwelling units in San Francisco, based on OAHPP, compared to 84 for the project.

Transportation, energy, air quality, and noise associated with on-site uses would be about the same as those with the project (one percent greater). Cultural resource effects associated with construction of this alternative would be as for the proposed project.

SPONSOR'S REASONS FOR REJECTION

The sponsor has rejected this alternative because the proposed setback from the western interior property line is allowable under Section 272 of the Planning Code and it would not meet the objectives of the Federal Home Loan Bank. Also, this alternative would have greater shadow impacts than the proposed project due to a greater height on the northern portion of the building.

- E. ALTERNATIVE E: REDUCED BUILDING HEIGHT ALONG SACRAMENTO ST. WITH A 60-FT. DEEP SETBACK ABOVE
- ALTERNATIVE E1: BUILDING HEIGHT OF 50-FT. AT SACRAMENTO ST. WITH A 60-FT. DEEP SETBACK ABOVE

DESCRIPTION OF ALTERNATIVE

This alternative would be 50 ft. tall at Sacramento and Kearny Sts., with a 60 ft. setback or first step up to about 164 ft. tall, along the Kearny St. frontage, then a second step up

to about 244 ft. tall, about 110 ft. south of Sacramento St. (see Figure 31, p. 160). The 244 ft-tall portion would be separated into three vertical components of similar height. The entire Sacramento St. frontage of this alternative would be at a height of 50 ft., thus relating to the existing street wall height along Sacramento St. west of the site. By comparison, the project would be 138 ft. tall stepping up to 244 ft. tall, 118 ft. south of Sacramento St. along the Kearny St. frontage, and would step down from 138 ft. to 45 ft. about 85 ft. from Kearny St. along the Sacramento St. frontage. This alternative would include about 319,800 sq. ft. office and 10,700 sq. ft. of open space (compared to 312,700 sq. ft., and 10,400 sq. ft., respectively, for the project). Other features of this alternative would be the same as for the project.

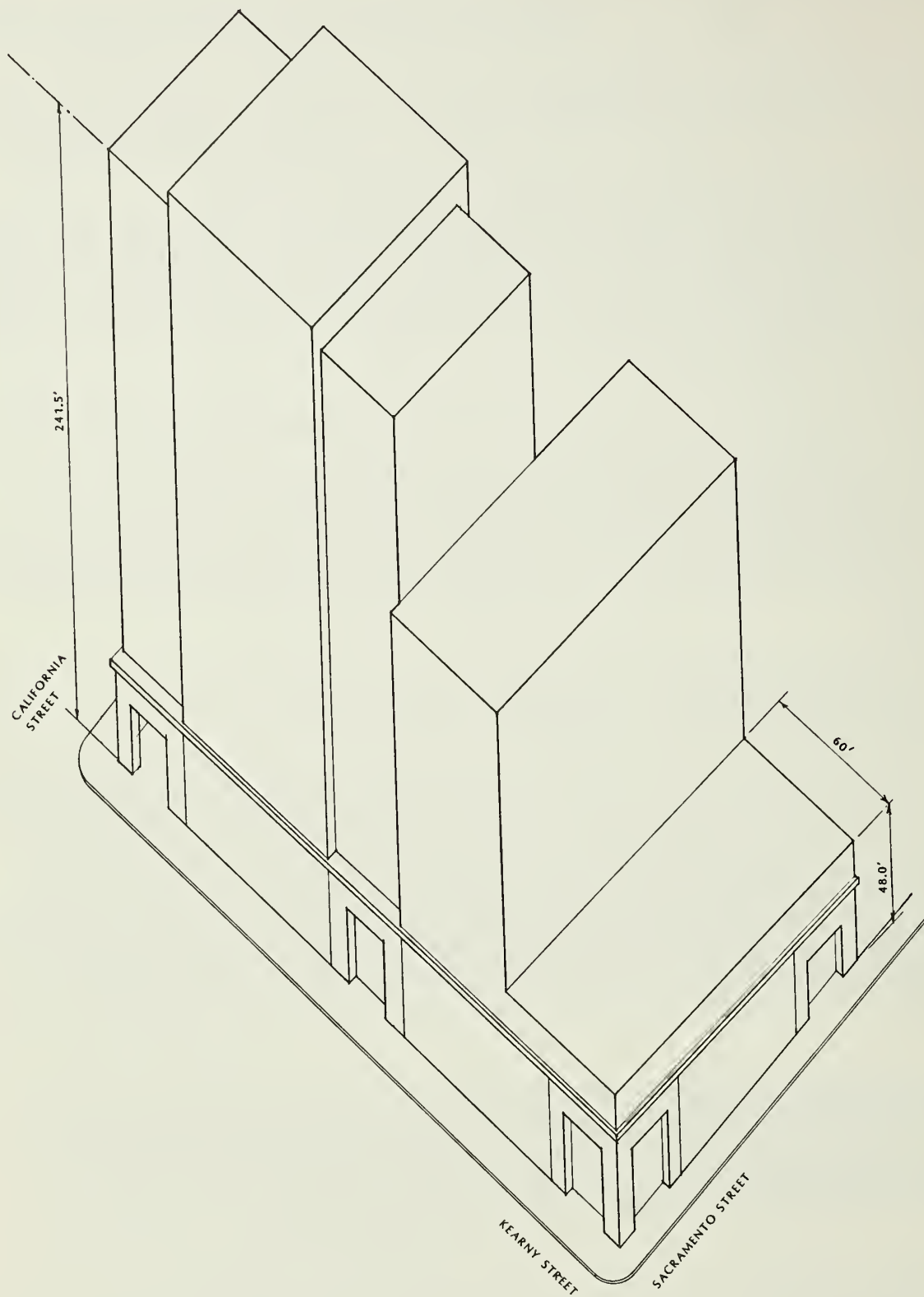
The FAR of this alternative would be about 12:1 compared to 11:1 for the project. This alternative would require about 72,360 sq. ft. of TDR, compared to 65,700 sq. ft. for the project. This alternative would have the same maximum lengths in the upper and lower towers and would require an exception from the City Planning Code, separation of towers and bulk limits as would the project. Other features of this alternative would be as for the project.

DISTINCTIVE ENVIRONMENTAL EFFECTS OF ALTERNATIVE

This alternative would be about 88 ft. shorter than the project at Sacramento and Kearny Sts. (for a depth of 60 ft.) 26 ft. taller than the proposed project at the northwest corner, and about the same height as the project for the southern portion of the building. This alternative would include three steps in the building, as opposed to two with the project (see Figure 31). It would be less prominent than the project in mid- and long-range views from the north and northwest, and would be of similar prominence in views from other viewpoints.

Shadow effects would be similar to the proposed project at most times of the year due to the similar height of this alternative (242 ft.) on the southern portion of the building. Wind effects of this alternative would be greater at eight of the locations tested, the same at six locations and less at eight locations than the project.

The open space requirement would be met as with the project. This alternative would meet the Planning Code requirement for art, as would the proposed project. This alternative would provide employment for about 1,240 employees, compared to about



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates

● FIGURE 31
ALTERNATIVE E1: BUILDING HEIGHT
OF 50 FT. AT SACRAMENTO ST. WITH
A 60-FT. DEEP SETBACK ABOVE

- 1,220 employees for the proposed project. It would generate a demand for about 86 new dwelling units in San Francisco, based on the OAHPP formula, compared to 84 for the project.

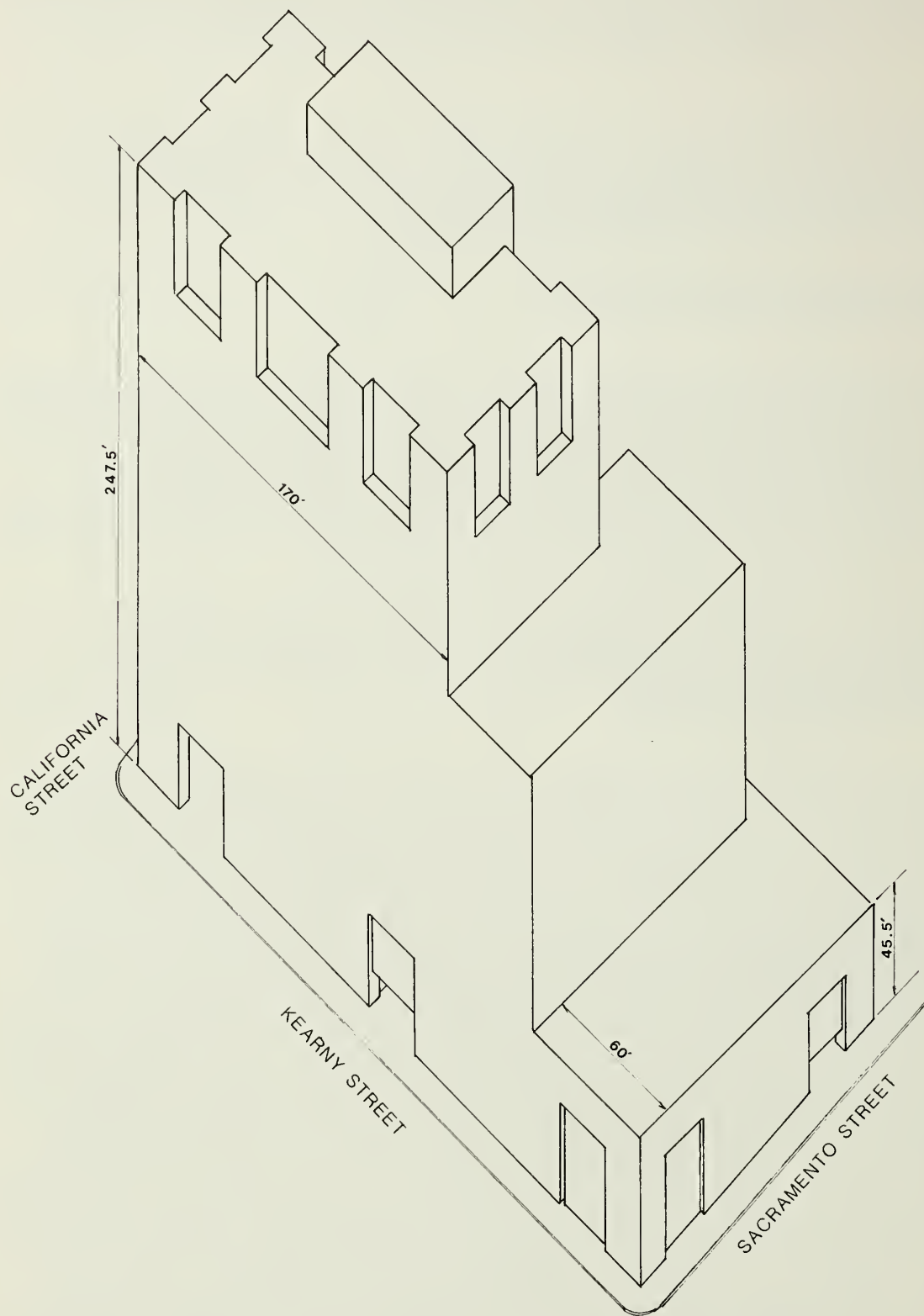
Transportation, air quality, energy, and noise effects associated with on-site uses would be about the same as for the project. Cultural resource effects associated with the construction of this alternative would be as for the project.

SPONSOR'S REASONS FOR REJECTION

This alternative has been rejected by the project sponsor because, in the sponsor's opinion, it would be architecturally inferior to the project and would result in a bulky and intrusive massing when viewed from the north. Furthermore, in the sponsor's opinion, this alternative would not meet the space planning objectives of the Federal Home Loan Bank because it would result in an awkward and inefficient layout.

- **ALTERNATIVE E2: BUILDING HEIGHT OF 50-FT. ALONG SACRAMENTO ST. (RANGING FROM ABOUT 47-60 FEET) WITH A 60-FT. SETBACK ABOVE AND ALTERNATIVE PARKING SCHEME**

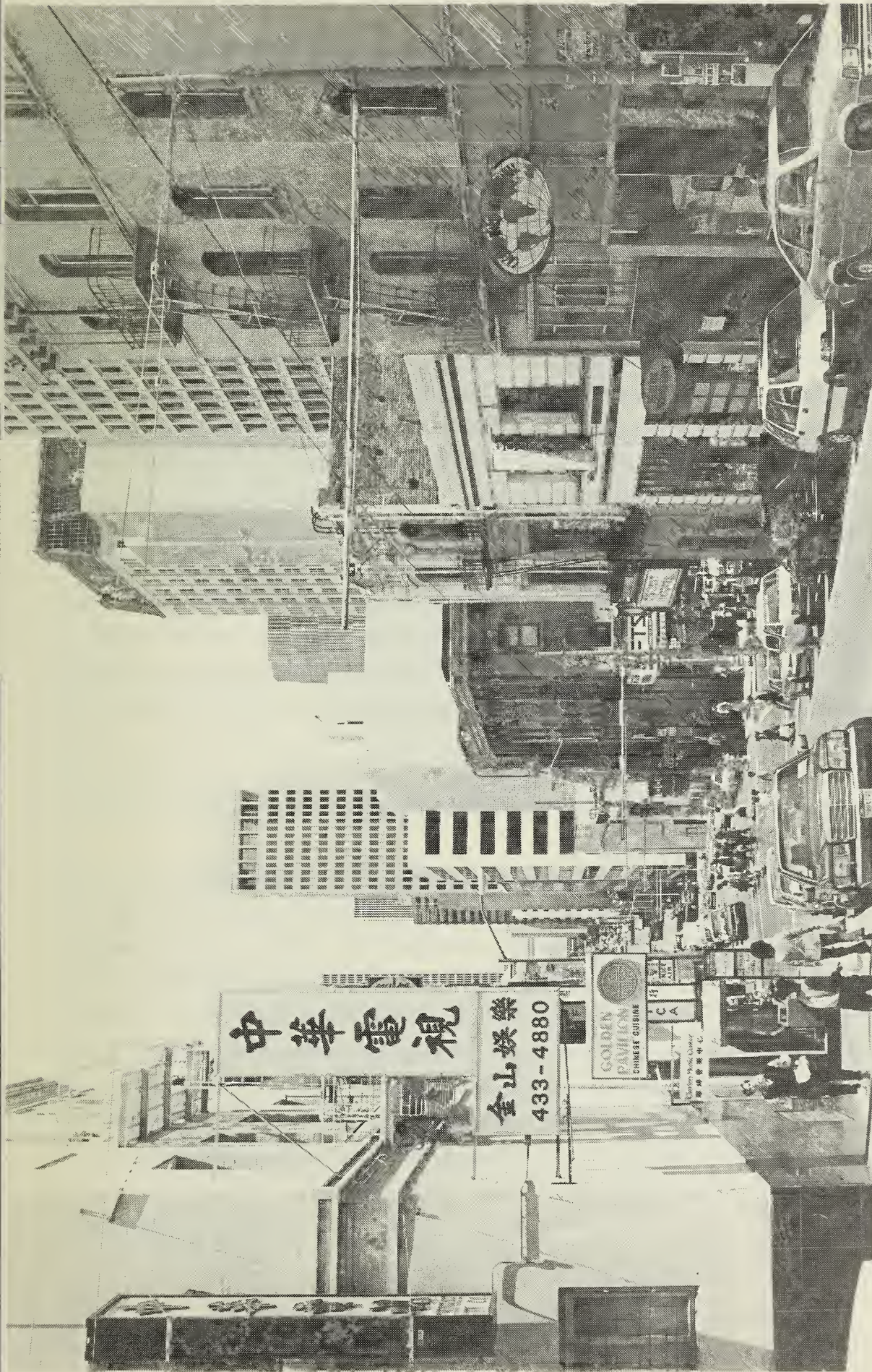
This alternative would be of similar design to Alternative E1 discussed on pp. 158 to 161 of the EIR except that it would step up in three steps instead of two from Sacramento to California on the Kearny St. frontage. This alternative would range from about 47-ft. at the west property line to about 60-ft.-tall at Sacramento and Kearny Sts. with a 60-ft. setback above. The building would step up from 50 ft. to about 146-ft.-tall, along the Kearny St. frontage about 60-ft. south of Sacramento St., then step up again to about 240-ft.-tall about 150 ft. south of Sacramento St. (See Figures 31A and 31B, pp. 161a and 161b). The 240-ft.-tall portion would not be designed with three vertical components as with Alternative E1. The entire Sacramento St. frontage would range from about 47-ft. to about 60-ft.-tall, and thus be more similar to the existing street wall height along Sacramento St. west and north of the site than the project. This alternative would include about 313,100 sq. ft. office, up to 10,000 sq. ft. retail, 130,600 sq. ft. of parking, loading, mechanical, storage, etc., (compared to 312,700 sq. ft. office, 7,900 sq. ft. retail, and 131,600 sq. ft. of parking, loading, mechanical and storage for the project). The open space requirement of 7,537 sq. ft. (compared to 8,020 sq. ft. for the project) would be met partially on-site in a ground floor galleria along California St. and off-site through the development of new open space at St. Mary's Square (similar to Option B in Alternative F,



600 California Street
Federal Home Loan Bank of San Francisco

● **FIGURE 31A – ALTERNATIVE E2: BUILDING HEIGHT OF 50 FT. ALONG SACRAMENTO STREET (RANGING FROM ABOUT 47-60 FT.) WITH A 60-FT. DEEP SETBACK ABOVE AND ALTERNATIVE PARKING SCHEME**

SOURCE: Kohn Pedersen Fox Associates



SITE

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Square One Film + Video

• FIGURE 31B
PHOTOMONTAGE OF ALTERNATIVE E2
FROM SACRAMENTO/WAVERLY INTERSECTION

but not including air rights from the International building). The building would contain about 400 sq. ft. more office space than the proposed project. The total number of parking spaces would be the same as with the proposed project (232 spaces). Of these, 50 would be proposed long-term, 48 proposed replacement short-term, 15 short-term spaces proposed to meet the demand generated by the building, with an additional 119 proposed short-term spaces, all subject to consideration and approval by the City Planning Commission. The parking and loading access and egress for this alternative would differ from the proposed project and Alternative E1. Under Alternative E2 all cars would enter on Sacramento and exit on Kearny, all trucks would enter and exit on Kearny (compared to all cars entering on Sacramento and exiting on Kearny, and all trucks entering and exiting on Sacramento with the project). A truck turntable would not be provided unless required by the Planning Commission as a condition of approval to eliminate potential truck back-ups onto Kearny St.

The FAR of this alternative would be about the same (11:1) as with the project. This alternative would require about 64,256 sq. ft. of TDR (compared to 65,700 sq. ft. for the project). This alternative would have greater maximum diagonal lengths in the upper tower and would require an exception from the City Planning Code separation of towers and bulk limits for the upper and lower towers as with the project. Other features such as building materials and facade ornamentation of this alternative would be as for the project.

DISTINCTIVE ENVIRONMENTAL EFFECTS OF ALTERNATIVE

This alternative would be about 88-ft. shorter than the project at Sacramento and Kearny Sts. (for 60 ft. south of Sacramento St.) and about the same height as the project for the southern portion of the building (about two-feet shorter). This alternative would include three steps in the building, as opposed to two with the project (see Figures 31A and 31B). It would be less prominent than the project in mid- and long-range views from the north, northeast and northwest, and would be of similar prominence from other viewpoints. This alternative would be more similar to the existing streetwall height, north and west along Sacramento St. in Chinatown, compared to the project which would be more than three times the height of the existing streetwall along Sacramento St.

Shadow effects would be similar to those of the proposed project at most times of the year due to the similar height of this alternative (242 ft.) on the southern portion of the building. In most instances, shadow would be less with this alternative than with the project with the following exceptions: At noon in December additional shadow would be added in the intersection of Clay and Kearny Sts. In March at noon and in September (one hour later) shadow would increase along Kearny at the northwest corner of Kearny and Sacramento Sts. affecting about 40 ft. of sidewalk length and 15 ft. of crosswalk. June 21 at 3 pm, shadow would increase along a length of approximately 20 ft of sidewalk on the east side of Kearny just south of Sacramento St./1/ A shadow analysis for this alternative is on file and available for review at the Department of City Planning, Office of Environmental Review, 450 Mc Allister St.

During the process of preparing a report evaluating the shadow effects of this alternative in relation to Proposition K, the Park Shadow Ban Ordinance, it was determined that shadow from the alternative could potentially reach the Chinese Playground and shade a narrow strip at its southwestern edge/corner. The effect would occur for about one minute on about five days starting about March 31, at about one hour after sunrise (7 am in March, 7:50 am in September) and for a similar time starting September 11. The project sponsor has stated that the facade of the building would be modified, if necessary, to eliminate this effect./2/ The change, if needed, would involve a slight alteration to the facade of the northeast corner of the southernmost tower (roughly two and one-half ft. by 12 ft. wide and 30 ft. vertically). This change would not be noticable at the scale of the drawings and photomontage prepared for this alternative./3/

Wind effects of this alternative would be about the same as for Alternative E1. Compared to existing conditions, Alternative E2 winds would be greater at nine of the locations tested, the same at six locations and decreased at seven locations. The required 7,537 gsf of open space for this Alternative would be met partially on-site in a galleria along California St. and partially off-site at St. Mary's Square. (similar to Option B of Alternative F, but not including air rights from the International building). This alternative would meet the Planning Code requirement for art, as would the proposed project. This alternative would provide employment for about 1,227 employees, compared to about 1,220 employees for the proposed project. It would generate a demand for about 84 new dwelling units in San Francisco, based on the OAHPP formula, the same as with the project.

Under this alternative all cars would enter from Sacramento St. and exit onto Kearny St. and trucks would enter and exit on Kearny St. This alternative would alter local circulation in comparison to the project as a result of the change to truck loading access. Traffic would decrease slightly from that expected for the project, at the intersection of Sacramento and Grant Sts., as not all trucks would have to pass through that intersection after leaving the building. Traffic would be about the same at the intersection of Sacramento and Kearny Sts. as for the project. With the one-way flows of Kearny and Sacramento Sts. cars would have to pass through the Sacramento and Kearny intersection on entering and on exiting (the same as for the project). Trucks would only pass through the Sacramento/Kearny intersection on exiting the building. Trucks would enter the loading area from Kearny St. and there would be no turntable. Trucks would need to back into the loading area, which could cause temporary back-ups and delays to traffic on Kearny St. which includes the 9X San Bruno Express and 15 Third Muni lines and Sam Trans Lines. A truck turntable would enable trucks to turn around on-site. Problems would not be expected with backing out onto Kearny except on days when the turntable broke down, which could result in temporary traffic delays on Kearny St. Peak loading activity occurs between 10 a.m. and 2 p.m./4/ Therefore, peak loading activity of trucks on Kearny St. associated with this alternative, would not be expected to coincide with peak period traffic on Kearny St. which occurs during the pm commute period. Also, Muni lines run on the opposite side of Kearny St. from the site. A truck turntable could be required by the Planning Commission as a condition of project approval.

The project would not change levels of service at nearby intersections or freeway on-ramps, and this alternative would have still less impact.

Additionally, under this alternative the curb-cut would be 40 ft. wide, exceeding the allowable 30-ft. curb-cut in City Planning Code, Section 155(d). Thus, this alternative would need an exception to the Standard Requirements for Automobile Driveways (Order No. 62850) from the Director of Public Works.

Air quality, energy, and noise effects associated with on-site uses would be about the same as with the project. Cultural resource effects associated with construction of this alternative would be as for the project.

SPONSOR'S REASONS FOR CONSIDERATION

The sponsor is considering this alternative as it would meet the space needs of the Bank, and respond to concerns raised about the project.

NOTES - Alternative E2

/1/ Memorandum from Charles Bennett, Vice President ESA, March 5, 1987. A copy of this memorandum is on file and available for review at the Department of City Planning, Office of Environmental Review, 450 Mc Allister St.

/2/ Raymond E. Terwilliger, Jr., Federal Home loan Bank of San Francisco, letter dated February 25, 1987. This letter is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.

/3/ The Proposition K analysis is on file and available for public review at the Department of City Planning, 450 McAllister St., Fourth Floor.

/4/ San Francisco Department of City Planning, 1980, Center City Circulation and Goods Movement Study.

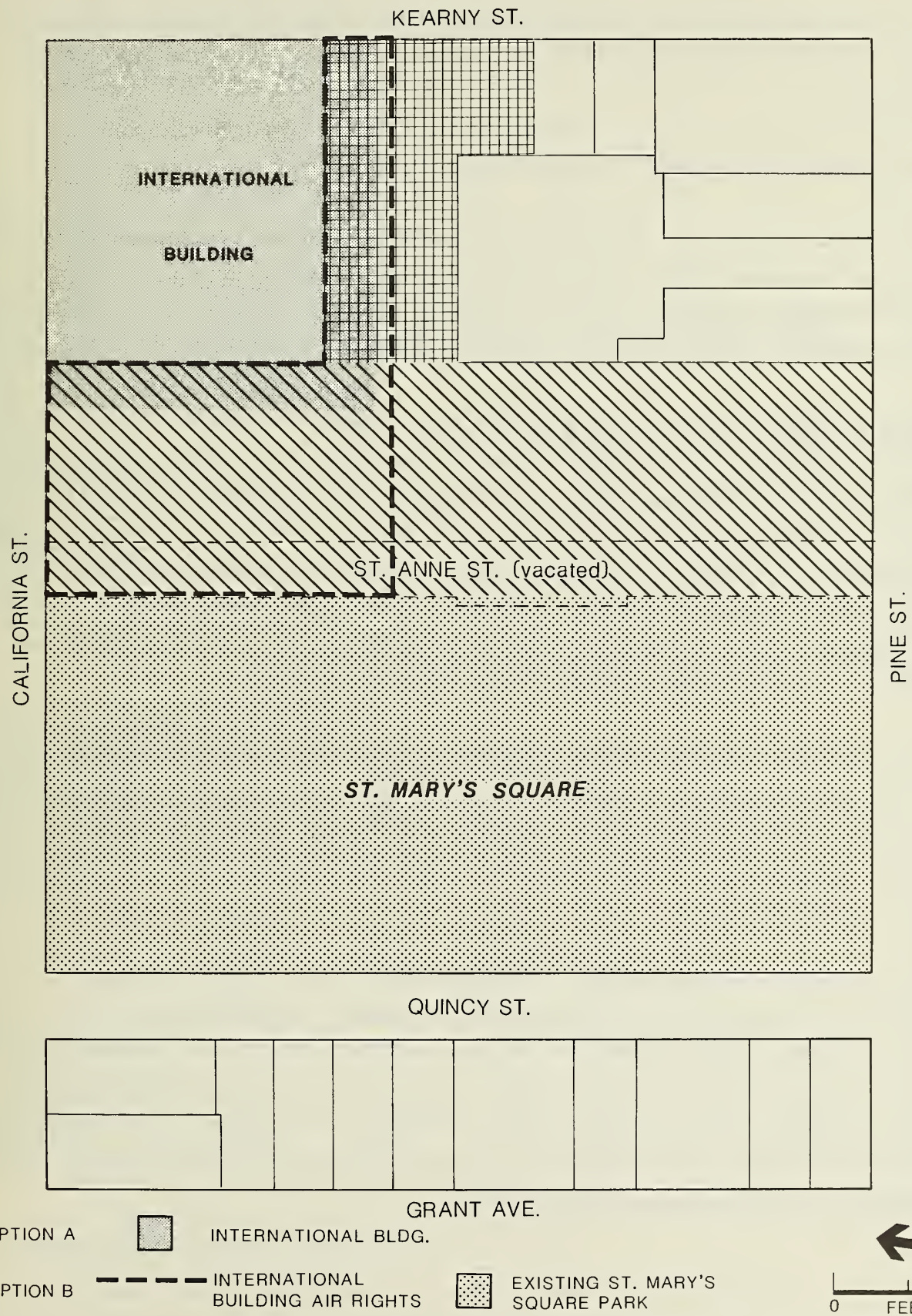
F. PROVISION OF REQUIRED OPEN SPACE OFF-SITE AT ST. MARY'S SQUARE

DESCRIPTION OF ALTERNATIVE

This alternative considers expansion of the St. Mary's Square Park in lieu of provision of open space on site. The project, as proposed, would provide open space on the roof of the 18 story tower and in an open galleria along California St. The St. Mary's Square Garage, as indicated in Figure 32, p. 162, is jointly owned by the San Francisco Department of Real Estate and the Parking Authority. This alternative considers either of two options: (A) payment by the project sponsor for the cost of construction of a platform over the L-shaped portion of the garage off of Kearny Street (see Figure 32), payment for an elevator running from Kearny St. to the top of the platform, and payment for the installation and maintenance of landscaping on the platform to allow access from Kearny St. to the park; or (B) in conjunction with the Department of Parks and Recreation,

payment for the extension of the St. Mary's Square Park over the area indicated in Figure 32. With this alternative, the proposed roof-top open space atop 600 California St. would not be built; however, the 3,100 sq. ft. galleria along California St. would still be credited toward the open space requirement of 8,020 gsf.

(Continues on p. 163)



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 32
PROVISION OF REQUIRED OPEN SPACE
OFF-SITE AT ST. MARY'S SQUARE

This alternative would require approvals from the San Francisco Department of Real Estate, Parking Authority, Department of Recreation and Parks, and the City Planning Department.

DISTINCTIVE ENVIRONMENTAL EFFECTS OF ALTERNATIVE

Under this alternative, the mechanical penthouse in the southern tower would be 16 ft.-tall compared to 22 ft.-tall for the project (as no stairway access or restrooms would be required to the roof with this alternative as with the project). All other features of this alternative (except the open space provision) would be the same as for the project.

Option A would result in the development of about 5,700 sq. ft. of new off-site park area over the St. Mary's Square Garage, in addition to the 3,100 sq. ft. on-site galleria along California St. Total new open space would be 8,800 sq. ft. for Option A compared to 10,400 sq. ft. for the project. Option B would result in payment for the extension of up to 27,250 sq. ft. of new off-site park area adjacent to St. Mary's Square; the 3,100 sq. ft. on-site galleria would still be built but would not count against the open space requirement. Total new open space would be 30,350 sq. ft. for Option B, compared to 10,400 sq. ft. for the project; this figure does include the galleria.

Traffic, air quality, energy, wind noise and employment effects of this alternative would be about the same as for the project. Shadow effects would be slightly less than those of the project, as the elimination of the elevator to the rooftop open space would reduce the height of the mechanical penthouse six feet. Impacts on cultural resources would be the same as for the project.

Option A would provide pedestrian access from Kearny where there is now none via elevator to the new open space area, as would the project. Option B would provide pedestrian access from California and Pine Sts. with the project to the proposed on-site rooftop open space, would have one elevator access in the south tower adjacent to the Hartford Building, and the galleria would be accessible at street level. Both options (A) and (B) would require an allowable exception to Code Section 138(c) under Section 309, for that part of the open space provided off-site.

● TABLE 12 REVISED: SUMMARY COMPARISON OF PROJECT WITH ALTERNATIVES B, C, D E1, E2 AND F

	<u>Project</u>	<u>Alt. B</u>	<u>Alt. C</u>	<u>Alt. D</u>	<u>Alt. E1</u>	<u>Alt. E2</u>	<u>Alt. F</u>
FAR	11:1	9:1	10:1	12:1	12:1	11:1	11:1
Height to top of Penthouse (ft.)	266	154	266	301	266	260	260
<u>Use Areas</u>							
Office (sq. ft.)	312,700	223,500	312,700	317,500	319,800	313,100	312,700
Retail (sq. ft.)	7,900	7,900	7,900	7,900	7,900	10,000	7,900
Parking, Loading, Mechanical, Storage etc. (sq. ft.)	131,700	130,700	41,100	131,700	131,700	130,900	131,700
Total Gross sq. ft.	452,300	362,100	361,700	457,100	459,400	454,000	452,300
Maximum Number of Floors	18	10	18	21	18	19	18
Required Open Space (sf)	8,020	6,236	7,234	8,116	8,162	7,537	8,020
Open Space Provided							
On-Site:	10,400	8,800	10,400	10,700	10,700	/a/	None
Off-Site:	0	0	0	0	0	/a/	(A)8,800 sq. ft. (B)30,350 sq. ft.
<u>Relationship to Downtown Bulk Requirements</u>							
Needs Bulk Exception	Yes	Yes	Yes	No	Yes	Yes	Yes
Needs Separation of Towers Exception	Yes	No	Yes	No	Yes	Yes	Yes
<u>Other Features</u>							
Child Care	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Art	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Need TDRs (sq. ft.)	Yes 65,700	No 0	Yes 26,300	Yes 70,200	Yes 72,360	Yes 64,256	Yes 65,700
Shadows on St. Mary's Sq.	No	No	No	No	No	No	No
Portsmouth Square	No	No	No	Yes	No	No	No
Chinese Playground	No	No	No	Yes	No	No	No
Housing Units							
Requires (OAHPP)	84	49	83	85	86	84	83
Potential Jobs	1,220	882	1,216	1,239	1,240	1,227	1,220

/a/ Some open space would be included on-site, in the galleria along California St., the majority of the requirement would be met off-site at St. Mary's Square.

SOURCE: Environmental Science Associates, Inc. and Kohn Pedersen Fox Associates

SPONSOR'S REASONS FOR CONSIDERATION

The sponsor has not rejected this alternative and is pursuing discussion with the Department of Real Estate, Parking Authority, Department of Recreation and Park, and the City Planning Department.

● VIII. SUMMARY OF COMMENTS AND RESPONSES

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A. INTRODUCTION

This document contains summaries of the public comments received on the Draft Environmental Impact Report (DEIR) prepared for the proposed 600 California St. project, and responses to those comments. Also included are staff-initiated text changes and errata.

All substantive comments made at the Draft EIR public hearing before the City Planning Commission, December 18, 1986, and all written comments received during the Draft EIR public review period from November 14, 1986, to December 29, 1986, are presented herein by direct quotation, edited to delete repetition and nonsubstantive material only.

Comments and responses are grouped by subject matter and are arranged by topics corresponding to the Table of Contents in the DEIR. Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of the comments. As the subject matter of one topic may overlap that of other topics, the reader must occasionally refer to more than one group of comments and responses to review all information on a given subject. Where this occurs, cross references are provided.

Some comments do not pertain to physical environmental issues, but responses are included to provide additional information for use by decision-makers.

These comments and responses will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated into the Final EIR, as indicated in the responses.

B. LIST OF PERSONS COMMENTING

Susan Bierman, Planning Commissioner, San Francisco City Planning Commission
(written comments December 18, 1986).

Georgia Brittan, San Franciscans for Reasonable Growth (SFRG)
(written comments, December 18, 1986 and December 19, 1986).

Gordon Chin, Executive Director, Chinatown Resource Center
(DEIR public hearing comments, December 18, 1986, and written comments,
December 18, 1986).

Susan Diamond, Attorney, Brobeck, Phleger, and Harrison
(DEIR public hearing comments, December 18, 1986).

Sue Hestor, San Franciscans for Reasonable Growth (SFRG)
(DEIR public hearing comments, December 18, 1986).

Jennie Lew, Committee for Better Parks and Recreation in Chinatown
(DEIR public hearing comments, December 18, 1986).

Lorraine Lowe, Chinatown Coalition for Better Housing
(DEIR public hearing comments, December 18, 1986, written comments,
December 18, 1986).

Michael Mah, Chinatown Transportation Research and Improvement Project (TRIP)
(DEIR public hearing comments, December 18, 1986, and written comments,
December 18, 1986).

Maurice Lim Miller, Executive Director, and R. Thomas Jones, Director of
Architecture, Asian Neighborhood Design
(written comments, December 18, 1986).

Rose Pak, Chinese Chamber of Commerce
(DEIR public hearing comments, December 18, 1986).

R. Paige Talley, Native American Heritage Commission (NAHC)
(written comments, December 3, 1986).

Wilbert R. Taylor, Analyst, Public Utilities Commission, (PUC) City and County
of San Francisco
(written comments, December 29, 1986).

K. L. (Dan) Wong, Environmental Review Coordinator, San Francisco Municipal
Railway (MUNI)
(written comments, November 20, 1986).

C. COMMENTS AND RESPONSES

TIERED ENVIRONMENTAL IMPACT REPORT

AB 944. ENVIRONMENTAL IMPACT REPORTS: TIERING

Comment

"p. 1 and 2. Find serious problem with tiering EIR's -- vital information is missing in a tiered document." (Susan Bierman, Planning Commissioner)

Response

The purpose of tiering as expressed in the State CEQA Guidelines is to "eliminate repetitive discussions of the same issues and focus the EIR on the actual issues ripe for decision." (Section 15152(a)). Tiering is cited in the introductory sections of the State Guidelines as one means of reducing delay and paperwork (Section 15006(m)).

The cumulative impacts analysis in the Downtown Plan EIR is applicable to all development proposed for the C-3 District that is in conformity with the Downtown Plan. By tiering the project specific EIR, as much as 100 pages of material can be eliminated that would merely repeat summaries of information from the Downtown Plan EIR, allowing readers to focus on issues specific to the project at hand. All of the cumulative material has been available to the Planning Commission and to members of the public, extensive review and comment has been received, and review in relation to the current situation shows that the Downtown Plan EIR remains applicable. The Department will continue to review the Downtown Plan EIR for its appropriateness for cumulative analysis.

DOWNTOWN PLAN ENVIRONMENTAL IMPACT REPORT

USE OF DOWNTOWN PLAN EIR

Comments

"Also find this document, based on DTP EIR is flawed regarding transit, particularly, also housing and air quality." (Susan Bierman, Planning Commissioner)

"p. 106 SFRG incorporates by reference all comments previously submitted to the DCP concerning C-3/non-C-3 transit impacts that were included on the 201 Spear St. [Supplemental] SEIR. Copies of those comments with appropriate pages checked were submitted again with the 101 Second St. DEIR." (Georgia Brittan, SFRG)

Response

The comment is noted.

As noted on pp. 1-2 and pp. 59-61 of the EIR, the 600 California St. EIR is tiered from the complete Downtown Plan Final EIR (EE81.3, Final EIR certified October 18, 1984). See also the preceding response concerning tiering. As explained on p. 2 and pp. 59-60 of the 600 California St. EIR, this EIR uses the forecast method for projecting cumulative impacts. The EIR for 600 California St. identifies the project portion of the cumulative impacts forecast in the prior EIR. Specifically, the EIR is tiered from the forecast and analysis of cumulative development contained in the Downtown Plan EIR. As part of the Initial Study for the 600 California St. project, the Department determined that the Downtown Plan EIR remains current (p. A-37 to A-38).

As explained above, during the tiering process for this project specific EIR, it was determined that the Downtown Plan EIR cumulative impacts analysis -- including transit, housing and air quality -- remains valid. Subsequent air quality impacts information has, in fact, shown that the Downtown Plan EIR analysis was conservative.

One of the primary goals of tiering environmental impact reports is the elimination of repetitive discussion of the same issues in order to focus documents on the actual issues ripe for decision. More specifically, the California Environmental Quality Act, at Section 21093 of the Public Resources Code, states,

"(a) The Legislature finds and declares that tiering of environmental impact reports will promote construction of needed housing and other development projects by (1) streamlining regulatory procedures , (2) avoiding repetitive discussions of the same issues in successive environmental impact reports, and (3) ensuring that environmental impact reports prepared for later projects which are consistent with a previously approved policy, plan, program, or ordinance concentrate upon environmental effects which may be mitigated or avoided in connection with the decision on each later project. The Legislature further finds and declares that tiering is appropriate when it helps a public agency to focus upon the issues ripe for decision at each level of environmental effects examined in previous environmental impact reports."

The Draft EIR published for this project incorporated by reference the transportation, air quality, and residence patterns and housing sections and was tiered from the Downtown Plan EIR. Those sections, which have already been incorporated into this EIR, include the setting and impacts discussions as well as the Comments & Responses chapters for the issues stated.

The Downtown Plan EIR was certified on October 18, 1984 after all of the comments on that document were responded to in the Summary of Comment and Responses. The 201 Spear St. EIR used the growth forecast from the Downtown Plan EIR and the previous list based approach while the EIR for the 600 California St. project used only the growth forecast methodology from the Downtown Plan EIR. Both the 201 Spear St. SEIR and this project EIR used the cumulative transportation analysis, including the C-3 and non-C-3 transit analysis from the Downtown Plan EIR.

Responding to the SFRG Comments concerning C-3 and non-C-3 transit impacts on the 201 Spear St. SEIR, as called for by the commenter, without specific regard for the issues relevant to this specific project, would undermine the intent of the Legislature to avoid repetitive discussion of the same issues in successive EIR's. All comments on the 201 Spear St. SEIR were responded to in the Summary of Comments and Responses document, prepared by the Department of City Planning, prior to certification of the Final SEIR for 201 Spear St., on November 14, 1985, which is hereby incorporated by reference. Similarly, the December 2, 1985 letter to the Board of Permit Appeals from the Department of City Planning which responded to the appeal by SFRG on the 201 Spear St. project (BPA 85-315) is hereby incorporated by reference.

The only attempt the commenter made to show the relevance of the approximately 135 pages of 201 Spear St. material to this project was to put checks on about 70 pages of the material. It is not appropriate to repeat the discussion of issues from those documents in the EIR for this project unless the effects had not been considered before. The Department of City Planning has been unable to ascertain, given virtually no specific points from the commenter, that any of the impacts' discussed in the 201 Spear St. documents indicate new effects which had not been previously considered in the EIR for the project at hand.

In the absence of any specific requests by the commenter or the City Planning Commission for further relevant information, the Department believes that the Draft EIR for this project, together with this Summary of Comments and Responses document, satisfies the legislative intent to focus EIRs upon issues ripe for decision, without repetitive discussion of unnecessary information already in the public domain.

DOWNTOWN PLAN ENVIRONMENTAL IMPACT REPORT

DOWNTOWN PLAN EIR: CURRENT ISSUES

Comments

"[R]ecent publications by the Department of City Planning show that the total increase in employment in the C-3 and Downtown non-C-3 show increases beyond what was accounted for in the impacts of the DTP EIR. Specifically, the projected increase in

employment for the greater Downtown as shown in the Caltrain Station Locations special study for Mission Bay shows a greater increase in employment than projected in the Downtown Plan EIR. This is what SFRG has been talking about for nearly two years. Please explain what impact this will have on increased transit and traffic demand and answer the following points:

"The DTP EIR projects an increase of 91,260 employees in the C-3 from 1984 – 2000. DTP EIR IV.C.47 states that employment will increase in the non-C-3 adjacent to the C-3 by half this amount and by half of this amount again in the remainder of the city for another approximately $45,000 + 45,000 = 90,000$ plus employees in San Francisco by 2000.

"The Caltrain Station Location study shows an increase of 169,041 employees between 1985 and 2000+. The difference between the C-3 increase and the increase for the total area is 77,781. This number is greater than the 45,000 presumed for the non-C-3 downtown under the DTP EIR.

"For C-3 increase please compare Table IV.C.12 with Table IV.C.10. For a comparison of total C-3 to downtown non-C-3 increase please look at Table 19 from the Caltrain Station Location study. Also included are maps from the DTP EIR and this study to compare the geographical boundaries of the areas included in this count. These boundaries are practically identical.

"Another Mission Bay special study includes similar confirming information that there is a greater increase in employment than projected. Table 5 from the Transportation Network study shows growth in employment in the same non-C-3 area as 57,381 new workers. Again, this number is greater than the 45,000 presumed for the non-C-3 downtown under the DTP EIR. A copy of this chart is also attached.

"Please include these submissions in the C&R (including copies of the 201 Spear submission). Please state in the C&R that all projections were prepared by Recht Hausrath." (Georgia Brittan, SFRG)

Response

Updated information is in order not only on the progress of Mission Bay planning but also on the effect of Proposition M on the Mission Bay proposal and on the South of Market Plan. The following response will, therefore, provide more recent information about these and other relevant studies.

The "Mission Bay Project" is part of an extensive public planning process underway in the Department of City Planning. The Department published the Mission Bay Plan, A Proposal For Citizen Review in January, 1987. Following public review and possibly staff revisions, and following preparation of an Environmental Impact Report (EIR), adoption of the Plan would require amendments to the Central Waterfront Plan of the City's Master Plan by the City Planning Commission, and would require approval of amendments to the City Planning Code and Zoning Map by the City Planning Commission, the Board of Supervisors, and the Mayor. The proposed Plan could also lead to a Development Agreement between the City and the sponsor, Santa Fe Pacific Realty Corporation. Any development agreement would also require action by the City Planning Commission, the Board of Supervisors, and the Mayor. Review and approval of development at the Mission Bay site would also require action by the Bay Conservation and Development Commission, Metropolitan Transportation Commission, and possibly the Army Corps of Engineers, Coast Guard, and the Regional Water Quality Control Board. If all of these actions were to result in approvals, an overall framework for phasing of development in the area would be established. Precise construction permits would still be required in order to permit actual construction and later occupancy of the first buildings in the Mission Bay project area.

Thus, the process to permit major new development in the Mission Bay area is a lengthy one. It is highly unlikely that all approvals would have been obtained and the area substantially developed by the year 2000.

TABLE IV.C.12: C-3 DISTRICT EMPLOYMENT GROWTH FORECAST FOR THE DOWNTOWN PLAN, 1981-2000

<u>Business Activity</u>	<u>Forecast 2000 Employment</u>	<u>Employment Growth 1981-2000</u>	<u>Growth Rate 1981-2000 (a)</u>
<u>Management/Technical Office</u>	251,590	79,040	2.0%
Manufacturing and Mining	28,300	10,080	2.3%
Finance, Insurance Real Estate	94,260	25,680 (b)	1.7%
Business and Professional Services	81,460	40,810	3.7%
Transportation, Communi- cations, Utilities	34,300	5,560 (c)	0.9%
Government Office	13,270	-3,090	-1.1%
<u>Trade/Customer Service Office</u>	51,880	17,110	2.1%
Wholesale and Manufac- turing Sales	22,890	9,650	2.9%
Retail Services	21,670	5,370	1.5%
Branch Banks	7,320	2,090	1.8%
<u>Retail Trade</u>	27,820	5,630	1.2% (d)
<u>Hotels</u>	19,920	6,620	2.2%
<u>Cultural/Institu- tional/Educational</u>	9,290	1,160	0.7%
<u>Industrial/Warehouse/ Automotive/Parking</u>	4,390	-2,540	-2.4%
<u>Building Maintenance/ Security</u>	7,230	2,030	1.8%
TOTAL (e)	372,120	109,050	1.84%

TABLE IV.C.10: ESTIMATED C-3 DISTRICT EMPLOYMENT BY BUSINESS ACTIVITY AND SUBAREA, 1984

Business Activity	Subareas							Total C-3 District	Percent of Employment
	1	2	3	4	5	6	7		
Office (a)	141,400	18,860	6,990	13,870	11,450	26,190	4,460	223,220	79.5%
Retail Trade	5,850	470	1,000	890	3,370	7,320	4,300	23,200	8.3%
Hotel	2,590	--	390	70	7,510	3,150	110	13,820	4.9%
Cultural/Institutional/Educational	1,410	160	950	320	3,330	660	1,510	8,340	3.0%
Industrial/Warehouse/Automotive/Parking	430	1,130	2,990	210	1,370	284	90	6,500	2.3%
Total Employment Allocated To Subareas	151,680	20,620	12,320	15,360	27,030	37,600	10,470	275,080	
Percent of Employment	55.1%	7.5%	4.5%	5.6%	9.8%	13.7%	3.8%	100%	
Building Maintenance	--	--	--	--	--	--	--	5,780	2.0%
TOTAL (b)								280,860	100%

NOTE: Based on employment analysis described in Impact section and in Appendix H. These 1984 figures are estimates of employment in 1984 based on the employment forecasts developed for the period 1981 to 1990. See note 20.

(a) Includes both management/technical office and trade/customer service office.

(b) Does not include construction employment, expected to average 5,270 jobs per year over the 1981 to 1984 period.

SOURCE: Recht Hausrath & Associates.

City And Region

Citywide Employment Impacts

Citywide employment is forecast to increase between 1981 and 2000 under the policies of the Downtown Plan. Just over half of this growth would occur in the C-3 District. The balance is likely to be divided about equally between the areas surrounding the C-3 District (south to China Basin including Mission Bay, Civic Center, Northern Waterfront and the Washington/Broadway Special Use District) and the rest of the City./31/ Depending on City policies governing future development in these areas, the average growth rate for total City employment could be about 1.5 percent per year. As indicated by the following discussion of impacts outside the C-3 District, the growth rate in areas near the C-3 District would be higher than the average. The rate would be lowest in the rest of the City./32/

Future changes in employment and business activity in City locations outside the C-3 District will be influenced by general economic factors, the City's land use policies for those areas, and real estate market conditions. The Downtown Plan would have an effect on real estate market conditions in other City areas, to the extent that existing or potential C-3 District business activities could locate elsewhere in the City and decide to do so because of the policies of the Plan. Section IV.B, Land Use and Real Estate Development Impact, identifies the possible impacts of the Plan in other City locations from the perspective of overall development patterns and how land uses might change due to shifts in activity and development outside the C-3 District. This subsection focuses on the types of activities that would shift from the C-3 District, the types of activities in other City areas that would be affected by this shift and the implications of these changes for City employment and job opportunities in San Francisco.

The most direct impacts of the Downtown Plan would be on new office construction in the C-3 District. Therefore, the citywide employment impacts of the Plan would primarily be the result of shifts of office activity and related uses. The office functions most sensitive to the costs of space would be

TABLE 19
ESTIMATES OF "GREATER DOWNTOWN AREA" EMPLOYMENT

TAZ	1985 ¹	2000+ ²	Change	% Change
1	193,408	287,673	94,265	48.7
2	70,880	94,971	24,091	34.0
3	51,716	63,611	11,895	23.0
4	7,256	11,295	4,039	55.7
5	11,940	12,045	105	.9
6	6,825	17,325	10,500	153.9
7-10	2,489	26,635	24,146	970.0
Total	344,514	513,555	169,041	49.1

¹ Source: Recht Hausrath and Associates.

² Source: Projections prepared by Recht Hausrath and Associates for use in the Mission Bay Special Studies to represent the Mission Bay build-out and a cumulative level of development for the other areas of the greater downtown.

TABLE 20
COMPARISON OF EMPLOYMENT PROJECTIONS

Mission Bay EIR Traffic Analysis Zone	SCR 74 Projections ^{1,2}	Projections for Mission Bay Special Studies ³			
		Land Use I	Land Use I SCR 74	Land Use II	Land Use II SCR 74
1	187,048	287,673	1.538	4	4
2	59,286	94,971	1.602	4	4
3	67,532	63,611	.942	4	4
4	21,737	11,295	.520	4	4
5	22,226	12,045	.542	4	4
6	34,451	17,325	.502	4	4
7-10	17,202	26,635	1.548	14,115	.82
greater downtown" total	409,482	513,555	1.25	501,035	1.22

¹ Approximations based on estimating geographic correspondence between zone systems.

² Source: Association of Bay Area Governments — Projections '83. Used as the basis for the travel forecasts for the Peninsula Mass Transit (SCR 74) Study prepared for MTC by Kaiser Engineers/Barton-Aschman Associates, February 1985.

³ Source: Projections prepared by Recht Hausrath & Associates for use in the Mission Bay Special Studies.

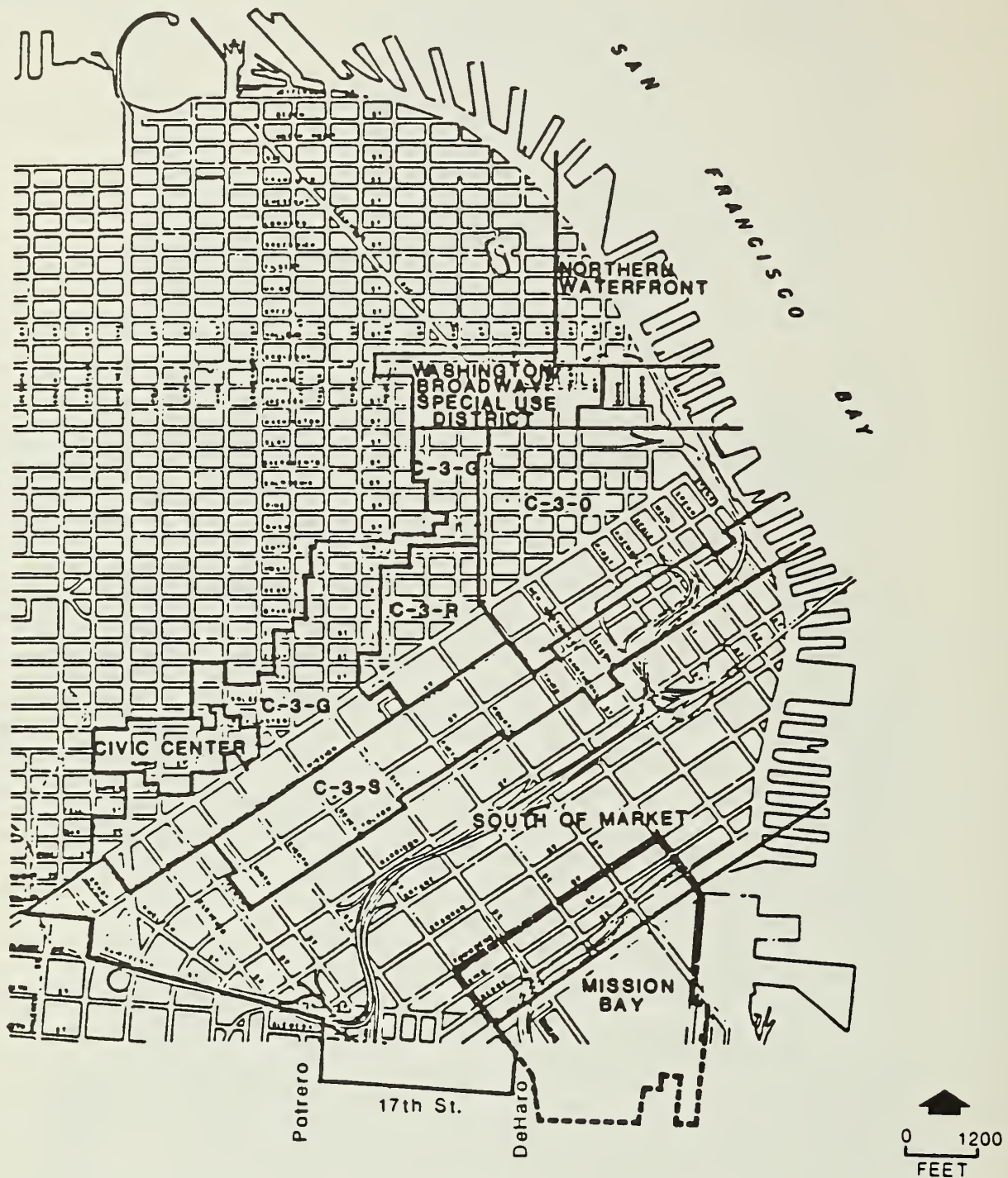
⁴ Same as for Land Use I.



Figure

GREATER DOWNTOWN AREA OF SAN FRANCISCO

[Attachment A]



**FIGURE H.2:
DOWNTOWN STUDY AREA USED IN
DEPARTMENT OF CITY PLANNING
FORECASTS**

SOURCE: Recht Hausrath & Associates

Table 5
ASSUMED DOWNTOWN EMPLOYMENT GROWTH

<u>Downtown Subarea</u>	<u>1985 Existing</u>	<u>Cumulative Growth</u>	<u>Percent Increase</u>
C-3 District	264,760	376,420	42%
South-of-Market	28,280	44,000	56%
Northeast Waterfront	22,025	34,000	54%
Civic Center	<u>27,448</u>	<u>34,000</u>	24%
SUBTOTAL	342,513,	488,420	42%
MISSION BAY (Full Build-out) ¹			
Mixed Use	2,001	25,135	
Maximum Housing	2,001	12,615	
TOTAL DOWNTOWN	344,514	501,035 to 513,555	45% to 49%

NOTE: ¹ It should be noted that Mission Bay development is not likely to be completed in the same time frame as the employment estimates for the rest of the greater downtown. As no longer-range growth estimates are yet available for downtown San Francisco, this study evaluates full development of Mission Bay together with the levels of downtown development shown. As a result, the analysis shows Mission Bay accounting for a larger share of downtown travel demand and impacts than would occur.

SOURCE: Recht Hausrath & Associates preliminary estimates.
See Appendix C for description.

In undertaking the Mission Bay planning effort, the City has accepted funds from Santa Fe Pacific to prepare planning studies. In resolutions accepting those funds, neither the City Planning Commission nor the Board of Supervisors has made any commitment to approve any development in the Mission Bay area. Board Resolutions No. 345-85 and 58-86 each state: "It is the intent of the Board of Supervisors that adoption of this resolution not constitute an approval of or comment upon any agreement or memorandum of understanding between the City and Santa Fe Pacific Realty Corporation not expressly approved by the Board of Supervisors."

On September 19, 1986, Santa Fe Pacific submitted an application requesting environmental review of their proposed plan/project (case no. 86.505E). This proposed project reflects the land use program outlined in a letter, dated October 16, 1984, from Mayor Feinstein to the Southern Pacific Land Company (commonly referred to as the Mayor's letter), as modified by a letter of May 17, 1986. The Santa Fe Pacific proposal would involve the construction of about 7,700 housing units, about 4.1 million sq. ft. of office space, about 2.6 million sq. ft. of research and development space, about 235,000 sq. ft. of commercial/retail space, a 500-room hotel, and about 74 acres of public open space on the 295-acre site.

Background studies for this major area-wide EIR are underway, accompanying the planning effort. This EIR will analyze five alternative development scenarios, including the Santa Fe Pacific proposal and four additional alternatives covering a wide range of land use mixes for the Mission Bay area. Each of these alternatives would include improvements to the street network and transit systems, both within the Mission Bay area and in its vicinity. A description of the five alternatives is available from the Department's Mission Bay staff.

Santa Fe Pacific's current proposal, as outlined in the application for environmental review, is to proceed with construction in a number of phases. The first phase (the only phase described in the application) would include office space in the block bounded by Third, Townsend, Fourth and King Streets, and residential units in the area south of China Basin between Third and Fourth Streets. Because the Mission Bay development proposal is not like a typical development for a single

building, the initial application requesting environmental review does not provide the same level of detail about building sizes, uses, design, and amenities that is normally provided. Design information for individual buildings does not yet exist. These individual buildings would require further details and could be subject to further environmental review before building permits were issued. It is not expected that individual buildings would be built and occupied and the space absorbed until sometime in the 1990s.

The Department's Proposal for Citizen Review includes types of uses similar to those proposed by Santa Fe Pacific, but in different amounts and, insofar as detail is available in the Santa Fe Pacific application, in different configurations. The land use program contains 7,700 to 7,960 housing units; 3.6 to 4.1 million sq. ft. of office space; 2.3 to 2.6 million sq. ft. of service/industrial/research and development space; 300,000 sq. ft. of retail space; a 500-room hotel; 70 to 78 acres of open space; and reserves an area for a ballpark. Maps of the locations of these uses are available from the Department's Mission Bay staff.

Preliminary to preparation of the Mission Bay Plan, the Department prepared 19 special planning studies on a variety of topics. These Mission Bay Special Studies were prepared and presented in the summer and fall of 1986 and were used by Department staff and consultants in preparing the Plan. In general, they cannot be used for other purposes; in particular, they cannot be used to update the cumulative impacts analysis provided in the Downtown Plan EIR.

An attempt has been made by some to compare the year 2000 Downtown Plan EIR forecasts of C-3 District growth and generalized estimates of growth through 2000 in the rest of the greater downtown area to the preliminary scenarios of cumulative employment growth in greater downtown San Francisco used in the Mission Bay Special Studies. Based on this comparison, questions have then been raised regarding differences in transit and traffic demand between the Downtown Plan EIR and the Mission Bay Special Studies.

It is important to understand some basic facts about the scenario of downtown employment growth used in the special studies. The scenario consists of order-of-magnitude estimates of future growth for the various subareas of the greater downtown: the C-3 District, South of Market, Northeast Waterfront, Civic Center, and the Mission Bay areas. These estimates were prepared in summer 1986. They were preliminary for use only in the Mission Bay Special Studies and are being refined for the Mission Bay EIR. (For more background, see Appendix C in the Transportation Network special study; an August, 1986 memorandum from Recht Hausrath & Associates to the Department of City Planning regarding "Preliminary Greater Downtown Estimates for Mission Bay Planning.")

The scenario of future downtown growth is labelled 2000+ in the special studies. This indicates two things. First, it indicates that the estimates are preliminary, without the supporting analysis to tie them to any one particular year. Second, the labelling reflects the decision to incorporate an estimate for Mission Bay representing full build-out of the project area in order for the special studies to address the full impacts of Mission Bay. Project build-out is not expected to occur until some time well beyond the year 2000. Thus, the 2000+ preliminary estimates are expected to occur sometime beyond the year 2000. This is acknowledged in footnote 1 of Table 5 in the Transportation Network special study.

Because the growth scenario used in the special studies is for 2000+ (and is so labelled, on both Table 19 on the Caltrain Station Locations special study, and Table 5 in the Transportation Network special study), it can be expected to represent a larger amount of employment growth than a corresponding forecast for the year 2000.

Nevertheless, the 2000+ scenario incorporates, in its entirety, the year 2000 Downtown Plan EIR C-3 District employment forecast of 376,420 (372,120 permanent employment plus 4,300 construction jobs). Therefore, the number of C-3 District workers used in the special studies analyses is the same as that used in the Downtown Plan EIR, not larger as alleged in the comment.

While the Downtown Plan EIR did not forecast growth for areas outside the C-3 District, the forecasts did account for employment increases in the greater downtown and the rest of the City. The preliminary scenarios used for the Mission Bay Special Studies do not contradict these estimates. For the non-C-3 District areas of the greater downtown, the preliminary scenario for 2000+ reflects growth from 1985 of either 45,000 or 57,000 depending on the Alternative for Mission Bay. As noted above, it is expected that Mission Bay build-out would occur beyond the year 2000, so growth up to 2000 would be less than these amounts. This magnitude of non-C-3 District growth is within the range of the growth potential through the year 2000 for the greater downtown areas outside the C-3 District presented in the Downtown Plan EIR. The somewhat larger amount of growth associated with the build-out of one of the two Mission Bay Alternatives used in the special studies is expected to occur after the year 2000+ and will be evaluated in the Mission Bay EIR.

The use of 1985 as the base year for the Mission Bay Special Studies (and as the setting year for the Mission Bay EIR) raises some complications for comparisons to the Downtown Plan EIR such as those attempted by the commenters. The work for the Downtown Plan EIR was done when the most recent citywide employment data available were for the year 1981. Surveys, interviews, and other analyses were conducted in 1981 and 1982 to establish an estimate of C-3 District employment in 1981. Most of the Downtown Plan EIR setting text and tables describing land use, space use, and employment conditions are for the year 1981. Other tables present estimates for the year 1984. The employment estimates presented in the EIR for 1984 are simple extrapolations of the forecast growth from 1981 through 2000.

The Department now has citywide employment data for 1984 and 1985. With analysis of recent trends in employment and space use, consultants were able to develop an estimate of C-3 District employment for 1985. These analyses have indicated that the short-term C-3 District growth from 1981 to 1984 presented in the Downtown Plan EIR did not occur. (The likelihood of this outcome is acknowledged in the Downtown Plan EIR. See Downtown Plan EIR, Vol 1, pp. IV.B.15 – IV.B.16, p. IV.C.26, note /22/ on p. IV.C.58, and Vol. 2, Appendix H, p. H.7.) The 1981 estimate of C-3 District employment presented in the Downtown Plan EIR has not changed as a result of the more recent analyses done to provide a comparable estimate for 1985. The 1985 estimate follows from the 1981 estimate and replaces the 1984 projection presented in the Downtown Plan EIR. The accompanying table (p. 188) presents

the relevant numbers used in this discussion of the Mission Bay Special Studies. The table shows that the 1981 and 2000/2000+ C-3 District total are the same when obtained from either the Downtown Plan EIR or the Mission Bay Special Studies. The difference is in the timing of the 1981-2000 growth. As discussed above, the updated estimate for 1985 indicated that C-3 District employment growth from 1981 to 1984 did not occur as projected in the Downtown Plan EIR. In fact, employment declined. Since the forecast total used for 2000/2000+ is the same, this simply means that the growth needed to reach the forecast total in the C-3 District shifts to the later (1985-2000) period for these special studies.

Because of this difference between the 1984 projection in the Downtown Plan EIR and the updated amount of C-3 District employment estimated for 1985, it is not correct to subtract the 1984-2000 increase in C-3 District employment presented in the Downtown Plan EIR from the preliminary 1985-2000+ scenario for the greater downtown presented in the special studies to derive an estimate of the employment growth for the non-C-3 areas used in the special studies. This calculation is presented in the fourth paragraph of the comment. The 1984-2000 increase in C-3 District employment shown in the Downtown Plan EIR is not comparable to nor a portion of the 1985-2000+ scenario of the greater downtown plus full build-out of Mission Bay; therefore subtracting one from the other will not produce a usable number.

The correct way to derive the estimates of growth outside the C-3 District is to use the information by area presented in Table 5 of the Mission Bay Transportation Network Special Study. The non-C-3 District growth can be calculated in two ways: either as the difference between the total greater downtown growth and that indicated for the C-3 District, or as the sum of the growth shown for the individual non-C-3 District areas (South-of-Market, Northeast Waterfront, Civic Center, and Mission Bay). The result of either of these calculations is the estimate of growth ranging from 45,000 to 57,000, depending on the Mission Bay scenario. The commenters derive correctly the high end of this range in the fifth paragraph of their comment, neglecting to cite the lower end (45,000) of the range.

In summary, there are three conclusions to be drawn from this explanation. First, the difference between the Downtown Plan EIR and the Mission Bay Special Studies in

TABLE C&R-1: COMPARISON OF C-3 DISTRICT EMPLOYMENT ESTIMATES FROM THE DOWNTOWN PLAN EIR AND THE MISSION BAY SPECIAL STUDIES

<u>Downtown Plan EIR</u>			<u>Mission Bay Special Studies</u>		
1981	270,370	(derived from published data)	1981	270,370	(derived from published data)
1984	286,130	(estimated from simple extrapolation 1981-2000 forecast)	1985	264,760	(derived from published data)
2000	376,420	(forecast)	2000+	376,420	(forecast)
Change 1981-2000	+106,050		Change 1981-2000+	+106,050	
Change 1981-1984	+15,760		Change 1981-1985	-5,610	
Change 1984-2000	+90,290		Change 1985-2000+	+111,660	

NOTE: The estimates in this table include both employment and annual average construction employment.

SOURCE: Recht Hausrath & Associates

non-C-3 District growth is not larger as alleged in the comment. Second, all the Mission Bay Special Studies used the same preliminary estimates of growth for the C-3 District and the rest of the greater downtown, not two different sets of numbers as implied by the commenters. Third, the 2000+ scenarios in the Mission Bay Special Studies account for full build-out of Mission Bay beyond the year 2000; therefore a corresponding growth scenario for the year 2000 would be within the range of the non-C-3 estimates in the Downtown Plan EIR. Full build-out of Mission Bay (beyond 2000) will be evaluated in the Mission Bay EIR.

With this detailed explanation, it becomes clear that the special studies, prepared for planning purposes, are not appropriately used to update cumulative analyses in the Downtown Plan EIR. When the Mission Bay Draft EIR is prepared and published, it may provide such an update.

Following preparation of employment estimates for the Mission Bay Special Studies, considerable time was spent preparing and refining forecasts of employment for the greater downtown area, including Mission Bay, for 1985–2000. These forecasts include employment expected in the portion of Mission Bay development expected to be built, occupied, and absorbed over that time frame. Essentially final forecasts were received in mid–February. While they may be revised slightly between now and publication of the Mission Bay Draft EIR in fall of 1987, they are not expected to be significantly different. The forecast results show that, based on employment decline in the C–3 District from 1981–1985, total future employment in the C–3 District in 2000 is likely to be lower than was forecast for the Downtown Plan EIR. Depending on the alternative development scenario used for Mission Bay, C–3 district employment in 2000 would range from about 331,150 to about 331,525, a net increase of about 69,180 to 69,550. Total greater–downtown employment, including Mission Bay, is forecast to range from 439,891 to 444,547, a net change of 98,158 to 102,814. (This information is found in a Memorandum from Recht Hausrath & Associates to Alec Bash and others dated January 23, 1987, and revised February 12, 1987.) This new employment information shows that employment forecasts used in the Downtown Plan EIR overestimated the amount of employment likely to be found in downtown in the year 2000. This probably means that some impacts were also overestimated in the Downtown Plan EIR. Both the employment growth and associated impacts would be likely to occur further in the future, several years after the year 2000.

The Department has also prepared and circulated the South of Market Plan: Proposal for Citizen Review (June 1985). As with Mission Bay, implementation of this or a revised plan would require an amendment of the City's Master Plan by the City Planning Commission and approval of ordinances amending the City Planning Code and the Zoning Map by the Commission, the Board of Supervisors, and the Mayor. Interim controls, based on the Plan with some modifications, were adopted on October 21, 1986, for an eighteen-month period. Unlike the Mission Bay Plan, the result of adoption of permanent controls would not be a development agreement for construction of a specific list of buildings and amenities. Therefore, the environmental analysis of the South of Market Plan will be at a somewhat more general level than the analysis in the Mission Bay EIR. The EIR for the South of

Market Plan is being prepared by Department staff, using some materials from specialized consultants. Estimates of employment growth to the year 2000 under the South of Market Plan have been prepared for the South of Market EIR. The estimates for this planning area alone show an increase of less than 8,000 permanent jobs and an increase of approximately 1.3 million sq. ft. of occupied and absorbed building space for all land uses. Most of this increase in space occupancy -- greater than 60% -- is expected to result from occupancy of existing vacant or underutilized space. When viewed in relation to the greater downtown, including Mission Bay, the South-of-Market area contribution to cumulative growth is relatively limited.

Proposition M, approved by the voters in November 1986, would limit the amount of office space that could be developed in both the South-of-Market area and the Mission Bay area because the proposition imposes a limit on the total amount of office space that can be approved in any one year in the city. Therefore, overall cumulative effects resulting from office employment would probably be somewhat reduced compared to those estimated without Proposition M. The EIRs for the two planning areas will assume development without Proposition M constraints on office space expansion in those areas in order to provide disclosure of the greater impacts that could result without the growth limitation. However, if Proposition M remains in effect, employment growth related to office development in both areas is likely to be slower than either the amount forecast in the respective EIRs or the amount estimated in the Downtown Plan EIR for the areas outside the C-3 District.

Neither of the environmental analyses on the two planning areas are near publication. The South of Market Area Plan Draft EIR is expected to be available in the summer or fall of 1987; the Mission Bay EIR will probably be available in fall 1987. Therefore, detailed cumulative environmental impact analysis is not available as of publication of this document. However, on the level of regional cumulative development, there are methods for predicting, in a general way, the transportation impacts of expected growth in regional economic activity, including activity at Mission Bay, for example, before Mission Bay EIR analyses are completed and published. Forecast methods, such as that used in the Downtown Plan EIR and in this EIR, account for this kind of potential, but somewhat speculative and non-specific, development. In the absence of precise forecasts or estimates of

amounts and types of land uses or transportation facilities and patterns in the area, the Downtown Plan EIR accounts for development which might occur in the area by the year 2000. For example, as noted on p. C&R-B.38 of the Downtown Plan EIR: "The EIR analysis does not ignore 'half the downtown growth,' the growth in 'functionally connected areas,' the cumulative list of major projects or Mission Bay. . . . The effects of all of these plans and projects on the economic dynamics of downtown development are incorporated in the EIR analyses and C-3 District forecasts." (See also, e.g., Downtown Plan EIR, pp. IV.C.35-36, IV.C.50, IV.D.60, C&R-B.37-43, C&R-B.56-59, C&R-B.75-76, and C&R-B.77-78, and Note/42/, IV.D.81d.)

To require that the regional cumulative impacts of alternative development scenarios be fully analyzed for the Mission Bay planning area or the South of Market planning area as part of an EIR on an individual building proposal in the greater downtown area prior to availability of such an analysis in an EIR on the respective planning areas themselves would be a de facto moratorium on building approvals until those EIRs on planning areas were completed. A more reasonable approach is to use the cumulative impact analysis available in the Downtown Plan EIR until a more detailed and final analysis of cumulative impacts, specifically including the South of Market Plan and specifically including the Mission Bay project, is prepared, and to incorporate preliminary information from the Mission Bay and South of Market planning efforts as that information becomes available in usable form. As explained above, there is no new analysis available with which to update the information provided in the Downtown Plan EIR on cumulative impacts of development. Based on preliminary employment estimates for 1985, it seems clear that the employment forecasts in the Downtown Plan EIR, on which much of the cumulative analysis was based, were conservative and may have somewhat overestimated employment growth over the analysis timeframe.

Over the past several months, additional data has been released by transportation agencies that should be reviewed and provided for informational purposes. BART ridership declined following a fare increase in January 1986, Bay Bridge p.m. peak traffic increased between 1982 and spring 1986, and Golden Gate Transit has announced a reduction in service due to ridership declines and related income losses. The Golden Gate Transit situation may change in the near future, however, as a ballot measure is planned to request a sales tax increase in Marin/Sonoma by one-half cent, to six and one-half cents, for transit purposes similar to other Bay Area counties.

Transportation conditions are fluid and are subject to constant fluctuation due to circumstances that cannot always be detailed, but which affect travel behavior. Since transportation analyses evaluate a fixed set of circumstances, they cannot account for all possible changes in travel variables. Often such changes have a "push-pull" relationship over the short term, whereby they generate improved operating conditions on one part of the overall transportation system at the expense of the operating conditions of another part.

This back-and-forth relationship is illustrated by recent changes in traffic flows and transit use in the East Bay/San Francisco corridor. Data from the Metropolitan Transportation Commission through spring 1986, indicate that Bay Bridge vehicle volumes have increased between 1982 and early 1986. At the same time, beginning in January 1986, BART ridership declined. Thus, service levels on BART improved for the remaining passengers at the same time that bridge traffic increased.

Transportation experts have advanced several reasons for the shifts. Increased driving is probably due in part to the drop in gasoline prices, particularly for drivers travelling longer distances who would be most discouraged from considering transit as an alternative. At the same time, BART fares increased by 30%, adding to the economic incentive. BART average weekday patronage reached its lowest point in June 1986, and has been increasing since then, although levels have not yet returned to pre-fare increase levels. It is interesting to note that gasoline prices have also gradually increased since September 1986, although there is no statistical measure of correlation between ridership and fuel prices. There is also no new information on Bay Bridge travel since spring 1986, so it is not known whether increases in BART patronage have been accompanied by decrease in bridge traffic.

The Bay Bridge traffic had actually increased beyond calculated design capacity as of spring 1986. This could be due to changes in driver behavior (e.g., that drivers are driving faster within closer proximity to each other) and acceptance of higher congestion levels than were factored into Caltrans' definition of capacity.

AC Transit has also experienced a drop in transbay patronage, due in part to an increase in "casual" and formal carpooling. Though more pronounced in the morning westbound direction, patronage has also declined in the evening eastbound direction.

The cost advantages of money and time (no bridge toll or bus fare, usage of HOV lanes, no waiting for buses) make carpooling particularly attractive. It is likely that reduced BART ridership, particularly from Contra Costa stations, is also partially due to increased carpooling. Some of the drop in transit patronage is also likely to be attributable to the drop in employment in downtown San Francisco over 1981-1985.

Within the context of long-term forecasts and impact analyses, it should be anticipated that contrary short-term fluctuations will occur. As freeway congestion and fuel prices increase, the incentive will shift towards transit and ridership will increase. It is simply not possible to account for all of these short-term changes in transportation mode in preparing a long-term analysis of cumulative transportation impacts resulting from employment growth.

Material submitted for this comment has been included in this document. The approximately 135 pages of material submitted for the 201 Spear St. SEIR and requested for inclusion here in the comment on p. 174, has not been included in this document. State CEQA Guidelines encourage reducing paperwork and delays. In addition, it is the intent of the legislature to focus EIRs upon issues ripe for decision, without repetitive discussion of unnecessary information already in the public domain. (See also the response on p. 172 herein).

PROPOSITION M

Comment

"P. 32 etc. Proposition M. Update needed." (Susan Bierman, Planning Commissioner)

Response

The first paragraph, p. 33, first sentence, of the EIR is revised as follows, (revised language is underlined):

The Office Growth Limitation Ordinance (Ordinance No. 414-85 approved September 10, 1985 by the Board of Supervisors, signed by the Mayor

September 17, 1985, and effective October 17, 1985) limited growth in the form of major office developments (over 50,000 sq. ft.) in San Francisco to a total of 2.85 million sq. ft. over a period of three years (an average of 950,000 sq. ft. per year).

The first paragraph p. 33, last sentence, of the EIR, is revised to read as follows (revised language is underlined):

About 312,700 sq. ft., the amount of office space in the proposed building, would count against the total allowable under the Ordinance.

The revised language includes the total office area instead of the net new office area.

The following new paragraphs are added to follow the first paragraph on p. 33 of the EIR and the last paragraph on p. 41 [see p. 41a]:

On November 14, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative. It amends Section 320(g)(1) of the City Planning Code to lower the threshold for office projects subject to the annual limit from 50,000 gsf to 25,000 gsf of additional office space. Since the proposed project would add office space in excess of 25,000 gsf, it is now subject to the provisions of Sections 320 – 325 as amended by Proposition M. Proposition M also adds Section 321.1 to the Planning Code, and reduces the approval period from three years to one year; and changes the limitation amount from 2.85 million sq. ft. of office space over three years to 950,000 gsf in each one-year period. Section 321.1 requires the adjustment of the 950,000 square foot annual limit by limiting new office space approvals to 475,000 sq. ft. annually until the total amount of space approved since November 29, 1984, is reduced to zero in annual increments of 475,000 sq. ft. Up to 950,000 gsf may be approved during the approval period ending October 1987 because no projects were approved under the Office Limitation Program during the first year period ending October 17, 1986.

Proposition M also establishes eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority policies. The City Planning Commission, in its decision regarding the proposed project approval or disapproval would make a determination of the project's conformance with the Priority Policies.

PROJECT DESCRIPTION

PROJECT SPONSOR'S OBJECTIVES

Comment

"Page 18. Project Sponsor's Objectives. Reference is made to 'alleviat[ing] existing space needs for . . . bank operations.' According to the Planning Department's May 5, 1986 'San Francisco Office Development Limitation Program Responses to Comments' FHLB will 'occupy approximately 35%' of new buildings. This would lead to a minimal increase in footage occupied by the bank. DEIR claims that the FHLB would occupy 'a majority' of the new office space. Which figure is accurate - 35% or 'a majority'? Give a more specific estimate than 'a majority.'" (Gordon Chin, Chinatown Resource Center).

Response

Since the May 5, 1986 document referenced by the commenter, the Federal Home Loan Bank (FHLB) has stated that it will require more than 35% of the space in the proposed project. To date, the FHLB anticipates occupying a majority of the office space in the proposed building, that is more than one-half of the space (more than 156,350 sq. ft.). A more specific estimate of the exact amount of office space the FHLB would occupy is not available./1/

NOTE

/1/ Raymond E. Terwilliger Jr., Director of Property Development, Federal Home Loan Bank of San Francisco, telephone conversation, February 9, 1987.

Comment

"What is sponsor's reason for proposing to exceed maximum average floor areas? For not providing required upper tower volume reductions." (Gordon Chin, Chinatown Resource Center)

Response

The sponsor believes that the proposed building would meet the general objectives of the Downtown Plan of reduced bulk with greater height. However, in order to incorporate other desirable features into the building (such as reducing the height of the building along Sacramento St.) and maintain economically feasible floor plates, the sponsor decided to seek what it believes to be minor allowable exceptions to maximum average floor area, upper tower volume reduction and separation between towers requirements.

PROJECT LOCATION

Comment

"Page 3 paragraph 2 should note that 'the block is bounded by California and Kearny Sts. in the financial district, Grant and Sacramento in Chinatown.' (underlined words are [proposed] revised text)." (Gordon Chin, Chinatown Resource Center)

Response

The first sentence of the second paragraph on p. 3 of the EIR is revised to read as follows (new language is underlined):

The 31,822-sq.-ft. site includes Lots 3 and 26 of Assessors's Block 241; the block is bounded by California and Kearny Sts. in the Financial district, and Grant Ave. and Sacramento St. in Chinatown.

PROJECT CHARACTERISTICS

Comment

"What is actual Project FAR – including retail, accessory parking and mechanical space?" (Gordon Chin, Chinatown Resource Center)

"p. 3 What would FAR be if retail were counted?" (Susan Bierman, Planning Commissioner)

Response

Including retail, accessory parking and mechanical space in the floor area ratio (FAR) calculation would give an FAR of 14:1 for the project. The FAR of the building including office and retail and excluding accessory parking would be 11.3:1. As noted in footnotes /e/ and /f/ of Table 1, EIR p. 21, Section 102.8(b)1-16 and 204.5(c) of the Planning Code allows for the exclusion of uses such as retail, accessory parking (and replacement short-term parking if required by the City Planning Commission), and mechanical space, from the FAR calculation.

Comment

"[I]n terms of direct impacts -- retail. We think it's important for the character of the community, for Sacramento St., to include small, Chinatown-oriented retail spaces. We hope the bank can accommodate those types of uses in its redesign.

"What types of retail establishments would be located on site? What square footage per store is expected? What rents would be charged to retail establishments per square foot?" (Gordon Chin, Chinatown Resource Center)

"We also would strongly recommend a limit on the size of commercial spaces along Sacramento St. consistent with existing patterns and the proposed Chinatown Community Plan (see enclosed information)." (Maurice Lim Miller and R. Thomas Jones, Asian Neighborhood Design)

Response

Tenants of the proposed building would be determined partly by the office and retail market at the time the space was rented. It is anticipated that retail establishments serving downtown office, and Chinatown-oriented retail space (for example, cafes, retail clothing shops, office supply stores etc.) would occupy most of the retail space in the building. A total of 7,900 gsf of retail space is proposed on the ground floor of the building, with entrances along Kearny and Sacramento Sts. Individual tenants

would rent space according to their individual space requirements. As specific tenants are not known, it is not possible to predict the amount of square footage each tenant would take.

As noted in the EIR on p. 32, second full paragraph, last sentence, retail space is expected to rent for approximately \$40 to \$50 per square foot per year (in 1986 dollars).

The "enclosed information" referred to by the commenter is a copy of the Chinatown Community Plan, A Proposal, December 1985, Published by Asian Neighborhood Design, the Chinese Chamber of Commerce, and the Chinatown Neighborhood Improvement Resource Center. [The title page has been reproduced in this document on p. 199.] The complete report is on file at the Department of City Planning, Office of Environmental Review, 450 McAllister St.

Comment

"p. 23 The project should not be approved until the 65,700 gsf of TDR is identified."
(Georgia Brittan, SFRG)

Response

The project sponsor would comply with requirements of the Planning Code concerning the Transfer Development Rights (TDR). The Planning Code (Section 128(h)) requires that the sponsor own the required number of TDR prior to issuance by the Bureau of Building Inspection of any building permit.

In addition, one of the criteria to be used in assessing individual projects under Section 321, Office Development Units, is, "the use if any, of TDR by the project sponsor" (Section 321(g)(3)(G)). In choosing from among projects that qualify for consideration under the minimum standards, the Commission may base its selection on (among other criteria): "the fact that the project is using TDR without regard to how much TDR is being used (quantity per se should not be considered because that will tend to encourage excessive use of TDR and result in overly large buildings) The Commission should consider the use to which the TDR funds are used only to

CHINATOWN COMMUNITY PLAN

A Proposal

Asian Neighborhood Design
Chinese Chamber of Commerce
Chinatown Neighborhood Improvement Resource Center

December 1985

the extent the funds will result in the seismic retrofit of the preservation building. (Dean L. Macris, Director of Planning, memorandum, January 8, 1987)

PROJECT SCHEDULE, COST APPROVAL REQUIREMENTS

Comment

"p. 69 Table 2 does not say that the project will need an exception to the 7 Mph requirement in a public seating area. (Rooftop open space)." (Georgia Brittan, SFRG)

Response

The EIR describes existing wind conditions and the project effects on winds in the site vicinity, on p. 7 of the Summary, p. 67 in the Table comparing the project to the Downtown Plan/Planning Code requirements, and pp. 104 – 105 of the Impacts Chapter. Pages A-42 to A-47 of the Appendix describe the wind tunnel methodology and set forth the test results including Figures B-1 and B-2 which show in graphic form the test locations and results for existing conditions, the project and three alternatives (9:1 FAR, 50 ft. Height on Sacramento St., and No Exceptions to Planning Code).

The project would, as stated on p. 7, "cause wind speeds to increase at five locations (by one to four mph), to remain the same at 11 locations, and to decrease at six locations (by one to eight mph)." As noted in the EIR, at one location, on the roof of the existing building at 600 California St., the 26 mph hazard criterion is now exceeded with existing conditions. With the project, the hazard criterion would not be exceeded at any of the locations tested. As noted on p. 7, one location which now meets the 11 mph standard would exceed the standard with the project. In addition, as stated in the Summary on p. 7, "Winds at four locations would be reduced by the project but would continue to violate the applicable comfort criteria. Two of these locations are pedestrian areas along California St., one is an existing seating area within St. Mary's Square, and one is the proposed rooftop terrace area [of the project]."

The last sentence on p. 7 of the EIR, the second from the last sentence of paragraph one under the Project column on p. 67, and the first full paragraph on p. 69 are revised to read as follows (revised language is underlined):

The project would require allowable exceptions to City Planning Code Section 148 for increased winds above 11 mph, noted above, and to continue existing exceedances of the comfort criteria as follows: to continue existing exceedances of the 11 mph criteria at nine other locations (the north side of California St. at the site's western boundary; the south side of California St. at the International Building's northwest boundary; the northeast, northwest, southeast, and southwest corners of the intersection of California and Kearny Sts.; the south side of California St. in front of the A. P. Giannini Plaza; and two locations within the A.P. Giannini Plaza), and to continue exceedances of the 7 mph criterion, on the rooftop of the proposed building, and at two locations in St. Mary's Square.

The third paragraph on p. 33 of the EIR [now on p. 33a] is revised as follows (new language is underlined):

The project would require an exception, in accordance with the provisions of Section 309, to increase winds above the 11 mph pedestrian criterion at one location and to continue existing exceedances of the pedestrian and seating criterion at twelve locations, allowable under Section 148(a).

If the City Planning Commission requires the wind mitigation measure discussed on p. 142 of the EIR, as a condition of project approval, then the proposed rooftop open space could be designed to meet the 7 mph seating criteria and no exception to Section 148(a) would be required for that location.

Wind effects of Alternative E2, discussed on pp. 289-296 herein, would be about the same as for Alternative E1.^{/1/} Compared to existing wind conditions, Alternative E2 winds would be greater at nine of the locations tested, the same at six locations and decreased at seven locations.

NOTE - Wind

/1/ Dr. Bruce White, letter dated March 4, 1987. This letter is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.

LAND USE AND ZONING

Comment

"How many residential units are there within one block of the site?" (Gordon Chin, Chinatown Resource Center)

Response

There are 658 residential units within a one-block radius of the site./1/ This includes the area bounded by Clay St. on the north, Pine St. on the south, Grant Ave. on the east and Montgomery St. on the west.

NOTE – Land Use and Zoning

/1/ Chinatown Plan and Rezoning Study, Background Issue Paper Two, San Francisco Department of City Planning, March, 1984.

COMPATIBILITY WITH ADJACENT USES

Comment

"On Page 42, there is a land use map in the project vicinity. That defines a lot of why I think there should be a change in the significant environmental effects description of this project. What it shows is incredibly small parcels, so small that it is sometimes hard to see the overlays. Those little grids that look nice and big in their tiny little squares at the bottom, become these tiny miniscule things on actual buildings.

"What it shows is a very intense pattern of development in Chinatown right across the street and surrounding this site. Also, there is a 'V' right across the street which doesn't seem appropriate. It's a loading dock. It's not the same thing as a vacant building. There are a lot of trucks coming out of what you describe as vacant there. It's the Hartford Building loading dock." (Sue Hestor, SFRG)

Response

The commenter is correct that the lot on Sacramento St. immediately adjacent to the site (not "across the street" as stated by the commenter) includes the loading dock for the Hartford Building. However, as noted on p. 18 of the EIR, second paragraph, fourth sentence, adjacent to the eastern boundary of the site is the Hartford Building and a two-story building. The two-story building is the one identified on the map with a 'V' on p. 42, adjacent to the proposed project. The Hartford Building's loading dock is located on the ground floor. At the time the EIR was prepared, the office space on the second floor was vacant. The 'V' on the map on p. 42 refers to the vacant office space on the second floor of that building, above the loading dock./1/ When investigated during preparation of this document, the office space above the loading docks was still vacant./1/

The fourth sentence in the second paragraph on p. 18 of the EIR, is revised to read as follows (revised language is underlined):

Adjacent to the western boundary of the site is the Hartford Building, and a two-story building which contains the Hartford Building's loading dock on the ground floor and office space on the second floor.

NOTE

/1/ Based on field visits by ESA on June 9, 1986 and January 14, 1987.

Comments

"'Office uses' above ground floor on Sacramento St. are generally association halls or social clubs, not C-3-0 type offices. This should be reflected." (Gordon Chin, Chinatown Resource Center)

Response

The third full sentence in the first partial paragraph on p. 41 of the EIR describes second floor uses in Chinatown (including along Sacramento St.) as follows:

"Generally in Chinatown, second floor uses are either residential,

as along Commercial St. and Waverly Pl. one block north and one block northwest, respectively, of the site, and as along the eastern side of Stockton St. between California and Clay Sts., about one and one-half block west of the site; or small business offices such as travel agencies, doctors' and dentists' offices, and headquarters offices for clubs and organizations catering to residents of Chinatown, such as those along Grant Ave., and Kearny, Clay, and Sacramento Sts."

DOWNTOWN PLAN

Comment

"We certainly hope that in terms of the secondary impacts of the project -- open space and how it's going to mitigate its open space requirements, housing, child care and the art requirements of the Downtown Plan -- that they be tailor-made to benefit residents and workers in Chinatown." (Gordon Chin, Chinatown Resource Center)

Response

The comments are noted. As described in the EIR on p. 65, Table 2: Relationship of the Project to The Downtown Plan Planning Code Requirements, "10,400 sq. ft. [of open space would be provided] on-site: (7,300 sq. ft.) outdoor terrace on the rooftop of the 18-story southern tower, and (3,100 sq. ft.) in a galleria along California St." The EIR also includes Alternative F, Provision of Required Open Space Off-Site at St. Mary's Square, pp. 161f – 165 of the EIR, see also pp. 297 and 298 of this report. The open space of the DEIR project or alternatives would be available for public use, including use by Chinatown residents. As noted in the EIR p. 68, first paragraph under Project column, "Sponsor would contribute funds for the construction of a low- and moderate-income housing project." It is not known at the present time whether these funds would be used for a Chinatown project.

As noted in Table 2, on p. 68 of the EIR, under Childcare (Section 315) the project sponsor would comply with the Planning Code, in a manner to be determined.

If the sponsor elected to pay the in-lieu fee it would be approximately \$220,000 which would be deposited in the Affordable Childcare Fund (Section 315(e)). The fund would be managed by the Director of City Planning solely to increase the supply of childcare facilities affordable to households of low- and moderate-income. It is unknown at the present time if such funds would be targeted to Chinatown.

As noted in Table 2, on p. 67a of the EIR, under Art (Section 149) the project sponsor would comply with the City Planning Code, in a manner to be determined. City Planning Code Section 149 "Art Works, Recognition of Architect and Artists and Model Requirements in C-3 Districts", describes the requirements including the location(s), for the provision of art works in C-3 districts. Section 149(a) states that art works ". . . shall be installed and maintained (i) in areas on the site of the building or addition and clearly visible from the public sidewalk or the open space feature required by Section 138 or (ii) on the site of the open space feature provided pursuant to Section 138, or (iii) upon the approval of any relevant public agency, on adjacent public property, or (iv) in a publicly accessible lobby area of a hotel."

ZONING

Comment

"Note that project site is on the Northernmost border of the C-3-0 district. Under Chinatown Interim Controls, heights to the immediate north and west of the project cannot exceed fifty feet.

"Note that project is bounded on two sides by the Chinatown Community Business area with an interim control of a 2.8:1 commercial FAR and fifty feet height limits. Contrast allowable development intensity on this site with the constraints placed on its neighbors. Would project respond to these disparities." (Gordon Chin, Chinatown Resource Center)

Response

As discussed on p. 46 of the EIR, the site is outside the area regulated by the Chinatown Interim Controls, the area immediately adjacent to the site, on the north and west.

The EIR describes on pp. 43–45, the height and the FAR limits in the immediate area of the proposed project, including the development constraints noted by the commenter. The EIR describes in the second paragraph on p. 45, that the Chinatown Interim Controls regulate the area north and east of the site. The map on p. 44, of the EIR which shows use and height and bulk districts shows the areas surrounding the site to the north, northeast, west, and south as regulated by the Chinatown Controls. Permanent controls for Chinatown were approved by the Planning Commission, after a public hearing, on February 19, 1987. After rezoning is implemented by the Board by ordinance, the ordinance must be signed by the Mayor. The permanent controls are scheduled for review and adoption by the Board of Supervisors sometime in March of 1987 (a hearing date has not yet been scheduled). The permanent controls are quite similar to Chinatown Interim Controls in place from July 24, 1986 to January 24, 1987 (City Planning Commission Resolution No. 10761); most of the changes were proposed by community groups during the public review process. The permanent controls have virtually the same use and height districts and FAR limits as the Interim Controls, shown in Figure 14 , p. 44 of the EIR. The EIR notes that the height limits north of and immediately west of the site are restricted to 50 feet, under the Chinatown Interim Controls (p. 45, paragraph four, sentence four). The same is true under the permanent controls. Also noted in the EIR, in the same sentence and paragraph is that the FAR, within this area would range from 1:1, to 2.8:1 (along Kearny St.), with Chinatown rezoning. This remains the same under the permanent controls also.

The site is outside the Chinatown Plan and rezoning area, as noted, and is within the C-3-0 (Downtown Office use district) and a 250-S height and bulk district described in the EIR on p. 43, in which the maximum basic FAR is 9:1 or up to 18:1 allowable with TDR, and in which the maximum allowable height is 250 ft. The DEIR project would have an FAR of 11:1. The DEIR project would have a two tower design as described in the EIR with a taller portion (18 stories) at California and Kearny and a shorter portion (9 stories) at Sacramento and Kearny. The project's relationship to surrounding development is discussed throughout the EIR, primarily in the Impacts Chapter, Land Use and Zoning, and Urban Design sections particularly on pp. 63, 67, 74, 75, 77, 78, 80, and 82–92. Additionally, Alternative E on pp. 158 – 161f,

as revised on pp. 288 – 296 herein addresses a development program that would include development of 50 ft. in height along Sacramento St. Alternative E2, under consideration by the project sponsor, also includes development of 50 ft. in height along Sacramento St.

OPEN SPACE

Comments

"p. 22 Please give information on the use of other existing rooftop terraces, particularly the Washington/Montgomery observation deck. Information should include: is it easily accessible to the public with clear signs; what floor is it located; is it well used? This will be a good comparison for the proposed open space."

"p. 65 Will there be a separate elevator for the public open space on the 18th floor of the California St. building? How will the public know about this space? How soon after the building is completed will the open space be open for the public." (Georgia Brittan, SFRG)

"Page 78. How 'public' would rooftop public open space be? What measures will be taken to ensure public accessibility?" (Gordon Chin, Chinatown Resource Center)

Response

The observation deck in the Montgomery/Washington building, is located on the 26th floor. A sign is posted at the security desk in the building lobby giving the hours the observation deck is open to the public (9 a.m. to 5 p.m., Monday through Friday). The security guard provides directions to the elevators leading to the building's 26th floor. There are signs on the 26th floor indicating the location of the observation deck.

The observation deck is not used by many people. It is most frequently used during the summer months and on clear sunny days. Employees of the building are the primary users, although the deck is occasionally visited by tourists and other members of the public./1/

Regarding the commenter's question about other "rooftop terraces," the Crocker Plaza open space is located at One Montgomery St. on the third floor. This rooftop open space is open to the public 10 a.m. to 7 p.m., Monday through Friday and 10 a.m. to 6 p.m. on Saturday. It is accessible through an entrance labeled, "rooftop garden" on the third floor of the main galleria, a pedestrian mall extending from Sutter to Post St. The rooftop can also be accessed from two elevators in the lobby of One Montgomery, on the corner of Montgomery and Post Sts. There are no posted signs indicating the location, or hours of public accessibility.

The rooftop was observed to be used frequently by many people during the weekday lunchtime hours, on sunny days, and less often during other times of the day./2/

The proposed rooftop open space on the 18th floor of the project would have a separate elevator for public access as shown on Figures 3-6 on pp. 25-28 of the EIR. The rooftop elevator is so labeled in these plan views of various levels of the project. As required under Planning Code Section 138(i) there would be an informational plaque in a publicly conspicuous location which would provide notice to the public of the location and features of the rooftop open space, directions to the elevator (which would be dedicated exclusively for access to the open space), and the hours that the open space would be open. The open space would be publicly accessible during daylight hours upon building completion.

The open space provided by the project sponsor in order to satisfy the open space requirement would be subject to Section 138(d), which requires that, at least 75% of the total open space approved is to be open to the public during all daylight hours.

NOTE - Montgomery/Washington Open Space

/1/ This information was provided by the security guard on duty at 655 Montgomery, at 11:00 a.m. on Friday, January 23, 1987. Trammell Crow, the building owners/managers would not permit the name of the guard to be released.

/2/ This information was obtained during site visits by ESA staff on Friday and Monday, February 20 and 23, 1987.

Comments

"Some of the things that need to be mitigated is the impact of open space that Chinatown feels from the onslaught of the Financial District -- being so close in proximity to the Financial District with its many workers.

"Given that, hopefully, they will address the concerns of the other community groups in Chinatown, we just want to be on record as saying that we would appreciate it if the City Planning Department, together with Park and Rec, would see if there are any limitations to providing additional open space or having the open space contribution of the Downtown Plan being applied to Chinatown.

"I may be incorrect, but I think this needs to be clarified. I believe that the Downtown Plan says that there is so [much] square footage that needs to be provided by the sponsor, and also funds. There may be some limits to this, in that it has to be within 900 feet of the site and may have to be within a C-3 District.

"Technically, if this is true, the funds may be limited only to St. Mary's Square. In talking to Mary Burns and our committee about this, we feel there is a far greater priority to undertake major improvements in Portsmouth Square, and to try to find additional funds for the development of our new park -- now designated at the [Cathay Mortuary] site, as most of you know.

"We think it's very appropriate, if this goes through, that the Planning Department, together with Park and Rec, work with the community to make sure that we can maybe modify these requirements so that a high-need neighborhood that is already designated under the open space element is able to be included within an area.

"We may need an exemption. I don't know exactly what is technically required. But it seems a shame that Chinatown, because we are not within the technical language, may not benefit from these funds even though we are getting the impact.

"This also is perhaps applicable in the future to office projects that are on the border of the South of Market area, which is also designated as high-need, but is not, perhaps, within 900 feet of a particular office building." (Jennie Lew, Committee for Better Parks and Recreation in Chinatown)

Response

As the commenter states, City Planning Code, Section 138(c), specifies that the open space requirement for office development must be met on-site or within 900 feet of the proposed building within the C-3 district.

Alternative F, Provision of Required Open Space Off-Site, at St. Mary's Square, analyzes two options for satisfying the open space requirement of the project through improvements to St. Mary's Square, located within Chinatown.

CULTURAL RESOURCES

Comment

"Discuss importance of site in history of the development of San Francisco Chinatown. Did site ever contain any Chinese family or district associations?" (Gordon Chin, Chinatown Resource Center)

Response

Page 47 of the EIR, first (partial) paragraph describes uses on the project site dating back to 1857. This paragraph discusses the Chinese businesses known to have been located at the project site.

The archival report for the proposed project does not identify any specific Chinese family or district associations as located on the project site./1/ The background material used to prepare the archival report does not give any evidence to indicate that any Chinese family or district associations were located on the site./2/

NOTES – Cultural Resources

- /1/ The archival report was prepared by Mason Tillman Associates, April 11, 1986. This report is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.
- /2/ Dr. Eleanor Ramsey, Mason Tillman Associates, telephone conversation, February 25, 1987.

URBAN DESIGN

SCALE

Comments

"We were very concerned about the project's impact on Sacramento St. The proposed plan does not respect the character of Chinatown. The Chinese Chamber is located directly across the street from the proposed project. We have been there close to 80 years. Also on the same street, two doors away, the oldest Chinese language school. The average height on Sacramento St. is under 45-feet." (Rose Pak, Chinese Chamber of Commerce)

"As you recall, we had been involved in this project for quite some time -- from the original Downtown Plan hearings to the Chinatown plan hearings. It was our hope at that time that the site on Sacramento and Kearny could be incorporated into the Chinatown Plan. We feel quite strongly that that is the birthplace of Chinatown, and whatever is developed should be sensitive to those needs.

"This Commission did not see fit to change the Downtown Plan boundaries, but did acknowledge the fact that whatever is developed should be sensitively designed to Chinatown. I am very pleased to hear the Home Loan Bank Board is going to do a redesign that would try to accommodate those needs.

"We view the site as extremely critical to the future of our community. That is, literally, the sector of the community that is the birthplace of Chinatown. As our lengthy written comments will denote, we feel that the scale of whatever is developed is a critical issue. It is perhaps the paramount issue." (Gordon Chin, Chinatown Resource Center)

Response

On p. 36, second full paragraph, fifth sentence, the EIR notes that the Nam Kue School is located at 755 Sacramento St., one-half block east of the site. Page 48, third paragraph, fifth sentence, of the EIR describes the school, the year it was built and its architectural features. In addition, the Cultural Resources section of the Initial Study, (p. A-30 of the EIR), fourth paragraph, third sentence states, that the Nam Kue Chinese School building at 755 Sacramento St., was rated "1" by the Department of City Planning's Architectural Inventory of 1976 (this is a five point scale with five being the highest rating). The following is added to p. 47 of the EIR to the end of the first partial paragraph:

The Nam Kue School, located at 755 Sacramento St., two lots west of the site, was constructed in 1907 and is the oldest Chinese language school in San Francisco. The Chinese Chamber of Commerce building, located at 730 Sacramento St., north of the site, was built in 1922.

Comments

"We are concerned about design, how the building looks and the types of facade materials and what have you. But the major issue is the scale. How big the project is, how high it is, and how well it relates or doesn't relate to the scale of buildings around Sacramento St.

"On Sacramento St., the proposed tower is three to four times higher than neighboring structures and creates an oppressive and jarring alteration of scale. The incompatibility between the proposed highrise and neighboring Chinatown buildings is not adequately expressed in the Draft EIR.

Page 7, paragraph 2. Change 'larger in scale and taller than existing small scale, low and mid-rise buildings west and north of the site and in the same block in Chinatown' to 'Sacramento St. portion of project would be triple the scale of neighboring Chinatown buildings. California St. portion would be over five times the scale of neighboring Chinatown buildings.'

"Page 77. Note that project would be three to four times larger than neighboring buildings on Sacramento St. Throughout DEIR every reference to project being 'larger' than neighboring buildings to north and west should describe how much larger.

"Buildings to the north and northwest are not 'low- and mid-rise, they are low-rise.'

"'Promote harmony in the visual relationships and transitions between new and older buildings.' [Objective 3, Policy 1, Urban Design Element of Master Plan] Proposed building is three to five times larger than neighboring Chinatown buildings. While 'vertical bays, rectangular indentations and articulated building corners' might somewhat 'reduce the apparent bulk of the building,' the proposed Sacramento St. portion of the building remains way too big. (Gordon Chin, Chinatown Resource Center)

"[W]e have great concerns about the height of the building as it faces on Sacramento St. which is historically Chinatown, . . ." (Michael Mah, TRIP)

Response

The relationship of the proposed 600 California St. building to surrounding development and specifically development on Sacramento St., is discussed particularly on pp. 63, 67, 74, 75, 77, 78, 80 and 82-92 of the EIR. Throughout the EIR, the project is described in terms of the larger scale and height of its northern portion, in comparison to development on Sacramento St. As noted on p. 86, of the EIR, under the column titled Relationship of Project to Policies, fourth paragraph, the project would differ in form and scale from buildings north and west. Page 7, first full paragraph, last sentence accurately states that, "It would be larger in scale and taller than existing small-scale low- and mid-rise buildings west and north of the site, and in the same block, in Chinatown."

Page 92, first paragraph, second and third sentences of the EIR, are revised as follows (new language is underlined):

The 45 ft.-tall corner of the Sacramento St. frontage would be similar in height to existing structures on the project block, such as the 40-ft.-tall St. Mary's Church at California St. and Grant Ave. and the two- to four-story, 30- to 53-ft.-tall buildings along Grant Ave. and Sacramento St. west and north of the site. The 138-ft.-tall portion of the frontage would be taller and more visible than most existing structures on the project block which range in height from 26 ft. to 53 ft.; it would be from almost three to almost five times taller than existing buildings on Sacramento St. north of the site.

Figure 19, p. 83 of the EIR shows the low- and mid-rise buildings along Sacramento St. north of the site. Figure 15, p. 79 of the EIR shows the high-rise buildings along California St. south of the site. As seen from these figures, development along California and Sacramento Sts. is quite different. To compare the California St. project height of 244 ft. to buildings along Sacramento St. in Chinatown, as requested by the commenter, would be similar to stating for the purposes of comparison that the Sacramento St. project height of 138 ft. would be 677 ft. shorter than the Bank of America Building. The project site has a changed context from south to north.

The project sponsor is considering Alternative E2 (see pp. 289 - 296 of this document.) The northern portion of the building under Alternative E2, would be about 50-ft.-tall on Sacramento St. (ranging from about 47- to 60-ft.-tall) stepping up to 146-ft.-tall, 60 ft. south of Sacramento St. The northern portion of this alternative would both contribute to meet the space planning objectives of the FHLB and would be of similar height and scale to adjacent buildings north and west of the site along Sacramento St., which range from 26 ft. to 53 ft.

EIR p. 78, describes the proposed building design and materials. The last paragraph, fifth sentence states that the building would include bay windows and projecting piers clad in light-colored masonry, extending vertically to the upper portion of the towers, intended to complement building materials of adjacent structures.

Alternative E2 would incorporate some of the same design elements as the project and the same building materials.

Comments

"We have had the opportunity to review the 600 California St. Draft Environmental Impact Report and [these comments] are intended to bring to your attention those areas in which we feel the DEIR is inadequate. Most importantly, certain environmental impacts are understated and conformity with the urban design policies of both the Master Plan and Downtown Plan are exaggerated.

"RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT"

"Objective 2, Policy 6 – 'Respect the character of older developments nearby in the design of new buildings.'

"Proposed project is disrespectful of the character of older development nearby. Neither the scale nor the design of the proposed building relate well to buildings to the North or West." (Gordon Chin, Chinatown Resource Center)

Response

The relationship of the project to Urban Design Policies of the Master Plan is discussed in the Urban Design section of the EIR (pp. 77–93), including discussion, policy by policy, in Table 3: Relationship Between Applicable Urban Design Policies of the Master Plan and the Proposed Project, on pp. 85–91 of the EIR, from which the commenter cites policies and comments on them above and in the following five comments. Page 86, the fourth paragraph of Table 3, discusses the relationship of the proposed building to Objective 2, Policy 6: "The project would differ in form and scale from buildings north and west (on its northern portion) and would be similar to buildings south, east, and west (on its southern portion). The height of the architectural base and the 45 ft.–tall westernmost frontage along Sacramento St. are intended to complement the height of older development along Sacramento St. and Grant Ave. on the project block, and the base of the 580 California St. building."

Comment

"Objective 3, Policy 2 – 'Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance.' (p. 36)

"Building would contrast very strongly in shape with surrounding buildings." (Gordon Chin, Chinatown Resource Center)

Response

The relationship of the proposed project to Objective 3, Policy 2 is discussed on p. 87, first full paragraph of the EIR. As noted, the building would be similar in scale to

nearby newer buildings. As noted in the EIR and in the responses on pp. 213–214, herein, the DEIR project would differ in scale from older buildings, north and west along Sacramento St.

Alternative E2 (see pp. 289 – 296 of this document), under consideration by the project sponsor, would incorporate an approximately 50-ft.-tall portion (ranging from about 47- to 60-ft.-tall) along Sacramento St., which would be similar in scale to the prevailing streetwall height along that street. Alternative E2 would step up from 50 ft. to 146 ft., 60 ft. south of Sacramento St.

Comment

"Objective 3, Policy 5 – 'Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.' (p. 36)

"Proposed building is way out of scale." (Gordon Chin, Chinatown Resource Center)

Response

The relationship of the proposed project to Objective 3, Policy 5 is discussed in Table 3, pp. 87 and 88 in the EIR. The discussion of this policy notes that, "The project would be taller and more visible than existing structures along the south side of Sacramento St. adjacent to the site on the west, (except for the northwestern corner of the project which would be three stories tall) and two-to four-story buildings north across Sacramento St. and in Chinatown to the north. . . . It would be taller than low-rise buildings further north and south on Kearny St."

Comment

"Objective 3, Policy 6 – 'Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.' (p. 37)

"Proposed building would clearly violate this policy. It doesn't 'provide a transition'; it looms over its neighbors." (Gordon Chin, Chinatown Resource Center)

Response

The relationship of the proposed project to Objective 3, Policy 6 is discussed in Table 3, pp. 88 and 89 of the EIR. The discussion of this policy states, "The project would be greater in bulk than most of the low-rise older buildings in the site vicinity and similar in bulk to some newer development including the 580 California St. and International buildings; it would be of lesser bulk than the Bank of America and Hartford buildings. . . . The proposed building would step down from the taller southern tower to the lower northern tower; thus, the building would provide a visual transition between high-rise buildings adjacent to the California/Kearny intersection and mid-rise buildings at the Sacramento Kearny intersection . . ." The project would step down from 18 stories, 244 ft. at California St. to nine stories, 138 ft. at Sacramento St. thus providing a transition between taller development on the south and shorter development on the north.

Alternative E2, (see pp. 289 – 296 of this document), under consideration by the project sponsor, would be approximately 50-ft.-tall (ranging from about 47- to 60-ft.-tall) along its Sacramento St. frontage.

Comment

"Conserve the traditional street to building relationships that characterize downtown San Francisco.'

"Streetwall of proposed building would be too high and a cornice line won't disguise [sic] that." (Gordon Chin, Chinatown Resource Center)

Response

The comment is noted. The commenter refers to p. 106 of the Downtown Plan – Urban Form Chapter – Policies. The relationship of the project to this policy, is discussed on p. 91 of the EIR.

Comment

"Provide setbacks above a building base to maintain the continuity of the predominate [sic] streetwalls along the street.' (p. 106)

"Sponsor's response to this policy doesn't respond to the policy. Project on Sacramento St., as proposed, would be too large and include large ornamental features at roof level to emphasize tower." (Gordon Chin, Chinatown Resource Center)

Response

The relationship of the proposed project to this policy is described on p. 91 of the EIR. The following is added to p. 91, third paragraph under the column titled Relationship of Project to Policies:

The project proposes no setbacks from Sacramento St.; it would however step down from south to north along Kearny St. and from east to west along Sacramento St.

The project would step down from 18-stories to nine-stories along Sacramento St. and would step down from nine to three stories along a portion of Sacramento St. The project would also include facade ornamentation such as cornices at heights intended to relate to adjacent development.

Alternative E2 (see pp. 289 – 296 of this document), under consideration by the project sponsor, would maintain a streetwall height of 50-ft. (ranging from about 47- to 60-ft.) along the Sacramento St. frontage.

Comment

"What are the impacts of not meeting required property line setbacks? How will light and air be affected at street level? In the Hartford Building? In Chinatown?" (Gordon Chin, Chinatown Resource Center)

Response

The proposed project would require an allowable exception to the minimum setback, above the base of 15 ft. from the interior property line, for that portion of the building adjacent to the Hartford Building where the mechanical core of the project would be located. This exception is described in Table 2, on p. 68 of the EIR, under Section 309: Exceptions Required For The Project. Figure 4, p. 26, of the EIR shows the relationship of the proposed building to the adjacent Hartford Building, in plan view. The proposed project would include ground level setbacks which are not required by the Planning Code (only setbacks above the base -- above the ninth floor -- are required). A plaza/arcade would be located in this setback area adjacent to the existing Hartford Building Plaza, thereby making the existing Hartford Building Plaza more accessible and useable, than under existing conditions (a retaining wall now separates the existing 600 California St. Building from the existing Hartford Building Plaza).

New shadows from the proposed project are described and shown on pp. 93-104. The shadow studies show that the project would add no new shadow to any open space areas in the project vicinity (see the second paragraph p. 100). If the project were built to the property lines up to the ninth level and then set back 15 ft. along the western facade of the southern tower adjacent to the Hartford Building, there would be less light and air in the Hartford Building Plaza than with the project and approximately the same shadows as with the project on the rest of Chinatown. Currently, windows on the east facade of floors one to three in the Hartford Building, face onto the existing 600 California St. Building. With the proposed project the east windows, of floors one to 12 would face onto the proposed building. Thus, there would be less light into the Hartford Building's east windows on floors six to 12, with the project in place than under existing conditions.

Comment

"Show heights of all buildings in a two-block radius of site." (Gordon Chin, Chinatown Resource Center)

Response

Figure C&R 1, p. 221 of this document shows the building heights in a one block radius of the site. The EIR discusses building-heights in the near site vicinity on p. 92. In general, buildings west of Stockton St. are low- and mid-rise similar in height to those between Grant and Stockton. Buildings north of Clay St. are generally low- and mid-rise, similar in height to those between Sacramento and Clay. East of Montgomery St., are numerous high-rise buildings with some older low- and mid-rise buildings interspersed; building heights are similar to those between Kearny and Montgomery St. Buildings south of Pine and east of Kearny Sts. are primarily high-rise. West of Kearny they are mixed low- and mid-rise; similar in height to those between California and Pine Sts.

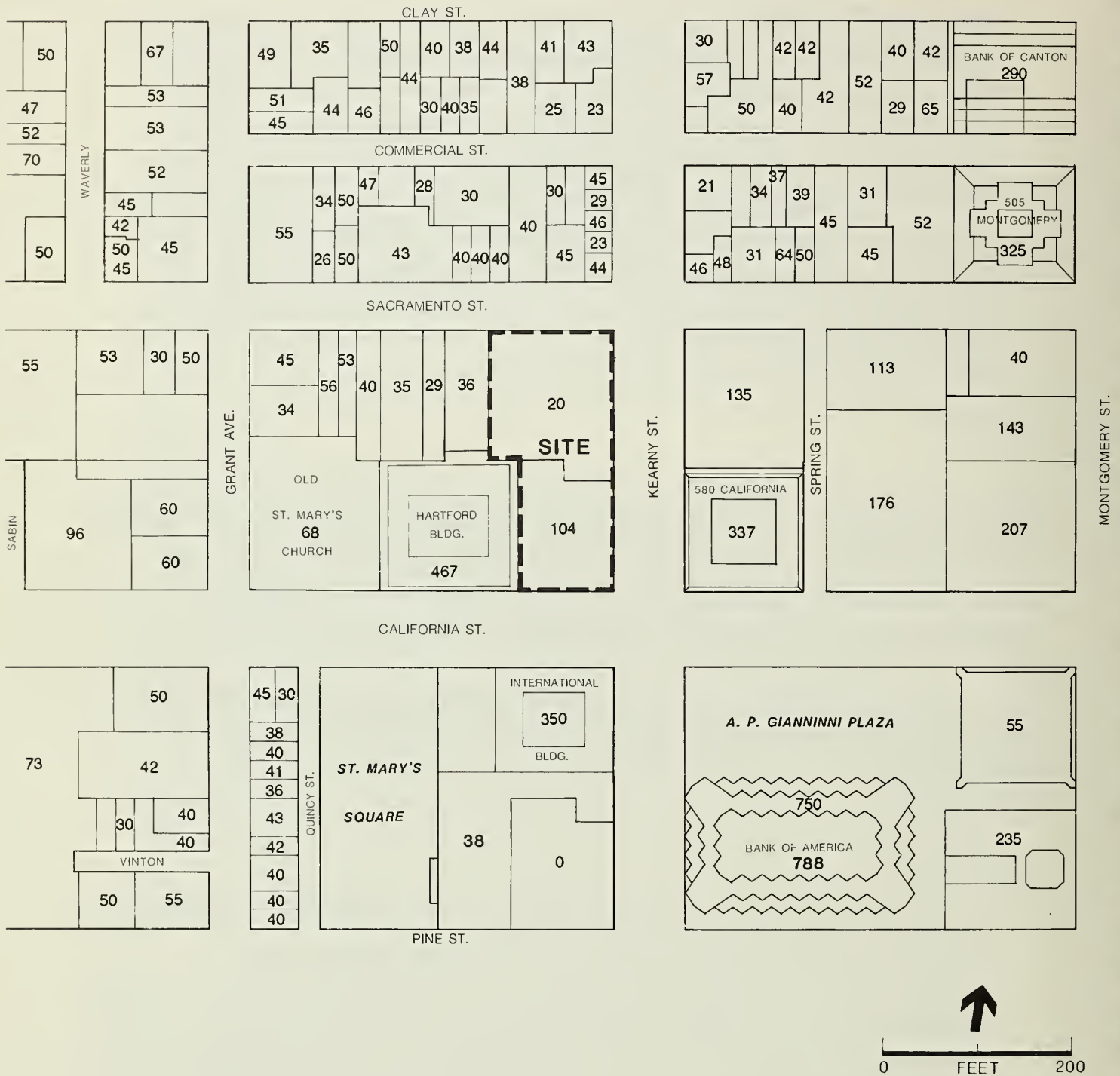
Comments

"Photos do not show useful views of scale impacts of proposed project as viewed from Chinatown locations. Show project in photomontage from Grant and Sacramento, Kearny and Commercial, Sacramento between Grant and Kearny (north side) and from each location and angle used in Figure 9, 10, 11, and 12. Show also photomontages of Alternative E from these locations." (Gordon Chin, Chinatown Resource Center)

"Photomontages don't show the 45-ft. part of the building clearly enough. EIR needs to show clearly which sides have no windows, and why?" (Susan Bierman, Planning Commissioner)

Response

The EIR photomontages provide views that are within one-half block of the additional viewpoints requested by the commenter. For example, the EIR includes a photomontage from the Sacramento/Waverly intersection; little additional information would be shown in a photomontage from Grant and Sacramento, or from the north side of Sacramento between Grant and Kearny. The EIR includes a photomontage from the Kearny/Merchant intersection; little additional information would be shown in a photomontage from Kearny and Commercial Sts.



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE C&R 1
BUILDING HEIGHTS IN FEET,
IN PROJECT VICINITY

Figures 9, 10, and 12, EIR pp. 37, 38 and 40 in the Setting Chapter are close-up shots of the existing buildings on the site. One of these views, northwest from A. P. Giannini Plaza (the photomontage in Figure 17, p. 81 is from approximately the same location as the photograph in Figure 10, p. 38) was picked for a photomontage to give the reader a rough idea of what the close-up view of the project would look like. Producing Figures 9 and 12 or a view from Sacramento between Grant and Kearny as photomontages would provide little additional information. This is because design details of the street level of the project are in process; further close-up views would necessarily be schematic only. Figure 11 is a view south along Kearny St. at about Commercial St., Figure 16, p. 80 is taken from a similar location (about one-half block further north) to Figure 11.

The project will be reviewed under City Planning Code Section 302, 321 and 322 in accordance with Section 309. Under the rules set by the City Planning Commission according to Section 321(b)(5), the project would undergo two reviews by an architectural review panel. It is likely that the design of the project or the preferred alternative will change in response to review by the panel. During the 321 process, photomontages of the final design will probably be prepared for the panel and the City Planning Commission. At that time, the plans will most likely include more detail about the project at street level.

Figure 19, p. 83 of the EIR, shows the Sacramento St. frontage, including the 45 ft.-tall portion of the project, and Figure 18, p. 82 shows a view of the project west up Sacramento St. These photomontages show that this portion of the project would not be noticeable from these viewpoints. As noted above, more photomontages of the project at street level will probably be prepared later in the process when more precise plans are available. The 45-ft. portion of the DEIR project may not be shown in greater detail if Alternative E becomes the preferred alternative.

Alternative E2 described on pp. 289 – 296 of this document, would have a street wall height of approximately 50 ft. (ranging from about 47- to 60-ft.-tall) along its entire Sacramento St. frontage. A photomontage of this Alternative is provided on p. 291 of this document.

All sides of the proposed building for the project and Alternative E would have windows.

Comment

"What is the function of the nineteen-foot tall screen on the northern portion of the tower?" (Gordon Chin, Chinatown Resource Center)

Response

The 19-ft.-tall screen, can more accurately be described as a wall; it would be constructed out of the same materials and architectural design as the facade of the building. This wall would screen mechanical equipment on top of the nine-story northern portion of the building. The 19-ft.-tall wall would be an architectural element which is intended to provide a unified building facade, and to reflect architectural elements at the top of the 18-story southern portion of the building.

Page 22, of the EIR, last paragraph, is revised to read as follows (new language is underlined);

Floors two through eighteen at California and Kearny Sts. would be office (including some mechanical space), with a mechanical penthouse above; floors two through nine at Sacramento and Kearny Sts. would contain office and some mechanical space with a 19-ft. wall above screening mechanical equipment.

Page 72 of the EIR, last paragraph, last sentence is revised to read as follows (new language is underlined):

The northern portion of the project would be included in the base, and would not extend above it (except for the 19-ft.-tall wall on the top of the ninth floor of the northern portion of the tower which would screen mechanical equipment).

HISTORIC/ARCHITECTURAL RESOURCES

Comment

"Show all historic or architecturally significant buildings within two blocks of site."
(Gordon Chin, Chinatown Resource Center)

Response

Architectural resources are discussed in the Initial Study for the project and were focused out of the EIR, because, as stated there (p. A-32), "The project would not affect any architectural resources on the project block or in the project vicinity." Appendix A, pp. A-29 to A-32 discusses architecturally significant buildings, including all architecturally significant buildings within a one-block radius of the site. Figure 5, p. A-31 shows architecturally significant buildings within one block of the site to the north, south and west and a two-block radius to the east.

Within a second block radius of the project site, to the north, south and west are about 35 buildings rated by either Heritage, the Downtown Plan or the Department of City Planning (DCP) 1976 architectural survey. Some buildings have been rated by all three surveys. Within this area, Heritage has rated four buildings A, one building B, and six buildings C. The Downtown Plan rates six buildings Category I, three buildings Category II, one building Category III and nine buildings Category IV. All of the buildings rated by the Downtown Plan are on Bush, Pine or Kearny Sts. except for one building on Montgomery St. The DCP 1976 survey has rated seven buildings "0," eleven buildings "1," eight buildings "2," six buildings "3," four buildings "4," and one building "5."

WINDComment

"p. 66 The wind will exceed the hazard criteria and the seating criteria on the 18-story open space. This does not sound like an appealing open space. In order to make it appealing, if mitigation measure [sic] do not succeed, the open space would be enclosed. Commenter contends this is not open space. The project would be meeting it's [sic] entire open space requirement with interior space.

"This is unacceptable and contrary to making a pleasant environment according to the Downtown Plan, which calls for a mix of types of open space. Most of the current projects under review would provide interior, enclosed open space in meeting their requirements. Please include a list of all proposed projects and their open space for comparison informational purposes." (Georgia Brittan, SFRG)

Response

As discussed on p. 7 and p. 105 of the EIR and shown on p. A-46, the hazard criterion is currently exceeded with existing conditions on the rooftop of the existing building at 600 California St. The hazard criterion would not be exceeded with the project, on its rooftop or at any other location tested, as discussed in the EIR on p. 7 and p. 105 and shown on p. A-46. The 7 mph criterion for seating areas which is exceeded on the rooftop with existing conditions, would continue to be exceeded on the rooftop of the project.

The wind mitigation measures on p. 142 would reduce wind speeds on the rooftop open space through the use of wind attenuating walls, deflectors, baffles, trellises or other features. If necessary wind walls would be provided. These would be of adequate height to reduce the wind speeds to meet the comfort criteria; however, the open space would be open to the sky; it would not be enclosed, roofed indoor space.

City Planning Code Section 138(e) details the approval of open space, type and features for development projects, overall. It specifies that no more than 20% of the space provided within the C-3 district shall be indoor space and at least 80% shall be outdoor space. The Planning Commission in taking action on projects must maintain the 20% to 80% indoor to outdoor balance for cumulative open space approved. All of the projects currently being proposed must, in combination, meet this requirement for indoor/outdoor open space.

Page 105 of the EIR, third full paragraph, last sentence is revised to read as follows (new language is underlined);

The seating comfort criterion would continue to be exceeded there (see mitigation measures p. 142 for a measure that would reduce winds there to meet the criterion).

Five major office projects have filed applications to compete for the 1986–87 office space allocation of the Office Development Limitation Program, as follows: 1) Van Ness Gateway. The DEIR project proposed 10,021 gsf of open space located in Building III, at the entrance to the building along South Van Ness Ave. That project has undergone revision since publication of the Draft EIR. The Office of Environmental Review has no information to date regarding revised open space. 2) 343 Sansome. That project originally proposed closure of Liedesdorff between Sacramento and California St. and development as an exclusive pedestrian way; the currently preferred alternative would provide a rooftop sun terrace on the existing 343 Sansome St. building to meet its open space requirements, with an option to close Liedesdorff St. between Halleck and Sacramento as an additional pedestrian amenity (leaving the street open between California and Halleck). 3) 235 Pine St. That project proposes to meet its open space requirements off-site, by contribution to development of Commercial St. between Sacramento and Montgomery Sts. as a pedestrian way. 4) 600 California St. The project proposes rooftop open space and a ground level galleria along California St. Alternative E2 discusses alternative provision of open space off-site in the form of contribution to develop access and open space at St. Mary's Square. 5) 101 Second St. That project proposes public outdoor space on the rooftop of the fourth floor of the building on the corner of Second and Mission, with a glass roof.

Comment

"p. 75 Says that the wind exceeds the 7 Mph comfort criteria at the project open space. By how much does the wind exceed the comfort criteria, or in other words, how fast is the wind up there?" (Georgia Brittan, SFRG)

Response

Page 75, referenced by the commenter, discusses the Downtown Plan/Planning Code requirements and the project in relation to these. Figure B-1, p. A-46, indicates wind speeds exceeded 10% of the time per year at each location. Wind at the proposed rooftop open space (location 22) would be reduced from 18 mph for 10% of the year (which exceeds 26 mph for more than one hour annually under existing conditions only at this location on the existing building roof), to 10 mph. Thus, the 7 mph seating criteria would be exceeded by 3 mph.

Comment

"At what five locations does proposed project increase winds? Where would proposed project cause new exceedance of pedestrian comfort criteria?" (Gordon Chin, Chinatown Resource Center)

Response

As stated in the EIR on p. 105, paragraph two, sentence two, "The project would cause winds to decrease at six of the 22 locations, be unchanged at 11 locations, and increase at five locations." As stated on p. 105, (underlining is for emphasis), "along California St. winds would increase at one location . . . winds at the one location on California (in front of the Hartford Building) that now meets the 11 mph criterion would exceed that criterion," [increasing from 11 mph to 15 mph] and "winds along Sacramento and Kearny Sts. would be increased at four locations, unchanged at three locations and decreased at two locations; the pedestrian comfort criterion . . . would be met at all nine of those locations." Figures B-1 and B-2, p. A-46 and A-47 show the wind test locations. The five locations where wind speeds would be increased with the project including the one location at which the pedestrian criterion would be newly exceeded, all as discussed directly above, are as follows (illustrated in EIR Figure B-1, p. A-46):

- o Location 1 – along the north side of Sacramento St., three lots from the corner of Sacramento and Kearny Sts., where winds would increase from 7 mph to 9 mph, with the project. The pedestrian comfort criteria would be met.
- o Location 2 – along the south side of Sacramento St. at the northwestern most corner of the site boundary. Winds would increase from 8 mph to 9 mph, and would meet the pedestrian comfort criteria.
- o Location 3 – at the northwestern corner of the intersection of Kearny and Sacramento Sts. Winds would increase from 7 mph to 8 mph, and would meet the pedestrian criterion.

- o Location 5 – at the southwestern corner of the intersection of Sacramento and Kearny Sts. Winds would increase from 8 mph to 10 mph, and would meet the pedestrian criterion.
- o Location 10 – along the north side of California St. at the westernmost boundary of the Hartford Building. Winds would increase from 11 mph to 15 mph; the pedestrian comfort criterion would be newly exceeded at this location.

TRANSPORTATION

Comment

"[T]he traffic that was routed all on the Sacramento St. side. All of you know what the traffic is like on Grant Avenue and Stockton St., because it's one way leading there. It [the project] will block the traffic, basically, from Market, downtown, Fisherman's Wharf, North Beach. But they have also modified the plan for that." (Rose Pak, Chinese Chamber of Commerce)

Response

As noted in the EIR on p. 116, "The project would change garage access at the site." The project garage entrance would be on Sacramento St. and the exit on Kearny St; the existing garage has entrances and exits on both streets. The EIR discusses the project effects on local intersections on pp. 116 and 118. The EIR analyzes the intersections of Sacramento St. with both Kearny St. and Grant Ave. As shown in Table 6, on p. 119 of the EIR, the project would not change the Level of Service at either of these intersections. With cumulative development to the year 2000, the Sacramento/Kearny intersection would deteriorate to LOS D. The project itself would not cause this LOS change.

Please see the discussion of Alternative E2 pp. 289 – 296 herein, currently under consideration by the project sponsor, which includes alternative loading access.

CONSTRUCTION TRAFFIC

Comment

"What is the expected new parking demand by construction workers? Will closure of curb lane, new parking demand, truck turning, and loss of eight loading spaces for two years cause a decrease of service levels on the 9X San Bruno, the 15 Third or the 1 California." (Gordon Chin, Chinatown Resource Center)

"During the two years of construction, what would be the effect on service levels of the Muni routes which pass by the site, particularly the ones which have stops near the project." (Michael Mah, TRIP)

Response

The EIR discusses the impact of construction workers, in the first (partial) paragraph of p. 108. As noted in the EIR, there would be, "temporary parking demand from construction workers' vehicles, and impacts on local intersections from construction workers' traffic, . . . in proportion to the number of construction workers who would use automobiles." Parking demand of construction workers cannot be precisely determined.

The EIR discusses the impact of construction activities on Muni operations on p. 107. To summarize, sidewalk and curb lane closure of Kearny St. and construction truck traffic would result in slower movement of traffic including Muni vehicles, as noted on p. 107. A mitigation measure (see pp. 142-143 of EIR) would minimize these effects. It is repeated here:

During the construction period, construction truck movement would be permitted only between 9 a.m. and 3:30 p.m. (that is, not /between 7 a.m. to 9 a.m. and 3:30 p.m. to 6 p.m.), to minimize peak-hour traffic conflicts and to accommodate queueing of Muni buses prior to the peak hours. The project sponsor and construction contractor would meet with the Traffic Engineering Division of the Bureau of Engineering of the Department of Public Works, the Fire Department, Muni and the Department of City Planning to determine feasible traffic mitigation measures to reduce traffic congestion during construction of this project and any other nearby projects. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction or later become known.

Muni staff reviewed the DEIR, prior to and following publication. See the response below to the comment which requests that trolley wires be unimpeded during construction. Muni did not have further comments regarding project construction.

Comment

"On Page 108, TRIP would like to have the contractor arrange to shuttle construction workers into the site in order to avoid adverse traffic and parking demands from use of their own vehicles." (Michael Mah, TRIP)

Response

The project sponsor does not propose to include a stipulation that the contractor shuttle construction workers to the site. The City Planning Commission could consider a shuttle as a condition of project approval when it takes action to approve, approve with conditions, or disapprove the project.

Comment

"As MUNI operates overhead trolley lines for the 1-CALIFORNIA along the Sacramento St. frontage of the project, we would like to be assured by the developers that the necessary construction measures will be taken so as to avoid any disruption of service." (K. L. (Dan) Wong, MUNI)

Response

As discussed in the Demolition, Excavation and Construction Traffic section of the Impacts Chapter of the EIR, p. 107, construction access to the site would be on Kearny St. Sacramento St. would not be used for construction truck access to the site and there would be no lane or sidewalk closures on Sacramento St. Thus, little or no disruption would be expected in service on the 1-California line. There are no eyebolts affixed to the existing structures on the site; therefore demolition of the buildings on the site would not eliminate these fixtures.

TRAVEL DEMAND

Comments

"p. 110 Please include information on some other TSM programs that are in place in other projects. For example: How is flex time working? How many buildings have firms that have flex time programs and what percentage of workers in the buildings are under flex time? What is the level of transit pass sales? Is there an increase in car/van pooling under the program? How many projects have implemented the TSM program?" (Georgia Brittan, SFRG)

Response

Three buildings in San Francisco currently have transportation brokers that have been approved by the City (333 Bush, 201 Filbert and 655 Montgomery). Two other buildings have had transportation brokers that have left the position (the building management of these buildings are seeking replacements), and the building management of 27 buildings currently are seeking brokers. The City must approve transportation brokers and monitor the TSM programs. The City is in the process of developing "minimum level of effort" standards for these TSM programs and is just in the beginning stages of the monitoring process.

Transit pass sales have been the single most effective and popular element of the TSM programs. However, there are, at present, no means to analyze the extent to which people change their mode of travel to transit as a result of the presence of a broker in the building.

The few buildings which currently have TSM programs have not actively advocated flextime as they contain a large number of employees who work in stock brokerage houses and already travel to/from work during non-peak times.

Many downtown projects approved since 1979 have been required to conduct a survey in accordance with methodology approved by the Department of City Planning. These surveys will help the City monitor the effects of the TSM programs. The zoning administrator determined that the survey would not be administered until a

building had reached 80% occupancy. To date, there have been about eight surveys administered. These surveys are meant to provide a basis on which to develop and implement TSM programs that will have a more direct impact on employee commute patterns. Follow-up monitoring surveys to be conducted periodically in these buildings in future years will provide an appropriate means to analyze the effectiveness of TSM programs in downtown buildings./1/

It is important to note that the TSM programs required for downtown buildings can only promote voluntary changes in commute behavior. The City does not have the authority, through these programs or other means, to mandate or force developers, property managers, or tenants to require that employees adopt any commute alternative. While promotion and advocacy of commute alternatives can be effective with effort and incentives, TSM programs are nevertheless limited by a number of variable factors and individual's choices.

NOTE – Travel Demand

/1/ Dave Feltham, Transportation Planner, Department of City Planning, telephone conversation, January 12, 1987.

Comment

"How was it determined that more people will walk from work than either drive, carpool, take BART, AC transit, Samtrans, Caltrain, GGT bus, or ferry? This seems very unlikely." (Gordon Chin, Chinatown Resource Center)

"Page 109, Table 4. The 'walk only' mode from the project figure seems very high, second only to Muni riders. How was this determined? What is the percentage of present staff who walk from work?" (Michael Mah, TRIP)

Response

As the EIR states on p. 108, "Assignments to travel modes for the project have been made on the basis of modal splits from the Downtown Plan EIR (EE 81.3) for the years 1984 and 2000." Appendix J of the Downtown Plan EIR contains a complete description of the travel demand methodology; that material has been incorporated

into this EIR (by virtue of tiering) as referenced on p. 106 and summarized in the following pages of the EIR. Modal splits, that is, the number of employees who walk, drive, take Muni or BART etc, are based on employee surveys conducted during the preparation of the Downtown Plan EIR which provided the baseline for journey to work trips.

It is not known what percentage of present staff walk to work.

TRANSIT

Comment

"Page 112. Because the #1-California [westbound] is usually loaded down with Financial District riders by the time it comes to Kearny St., which is the first stop in Chinatown, buses presently tend to bypass all the waiting passengers at the Grant Avenue stop and the Stockton St. stop. Even a few more riders waiting on Kearny St. would significantly impede service on Grant and at Stockton." (Michael Mah, TRIP)

Response

The comment is acknowledged. The #1-California line does operate near and above capacity in the project vicinity (California and Kearny) during the pm peak. It is not Muni policy to bypass passengers waiting for buses/1/; however, this sometimes occurs.

On p. 112, paragraph two, the EIR states that "existing peak-period and peak-hour transit ridership would be increased by 0.2 percent [due to the project]." Project ridership would be distributed over a number of Muni transit lines and corridors, and the EIR concludes that this increase would not be measurable on any one corridor or route. Table 4, p. 109 of the EIR, states that the project would generate about 170 peak-period (4 p.m. – 6 p.m.) trips and 90 peak-hour Muni trips in the year 2000. These would be distributed over the more than 30 Muni diesel bus, trolley-coach, and Muni Metro routes in the project vicinity, shown on Figure 28, p. 111 of the EIR. It is unlikely that the 180 Muni peak-period trips would be concentrated on one line, in one direction, at one time.

Pages 106-107 and 108 - 109 of the EIR summarize and incorporate by reference the transportation analysis from the Downtown Plan EIR, including the corridor-based, rather than route-based, analysis discussed in the last paragraph on p. 108 and first partial paragraph on p. 109 of the 600 California St. EIR. As noted on p. C&R-E.36 of the Summary of Comments and Responses on the Downtown Plan EIR: "The EIR uses the corridor-based analysis because it is not possible to predict accurately which individual transit lines future riders would use, only which corridor they would use. Additionally, it can be assumed that if a rider desired to take one line that was operating at or above capacity, he/she might switch to another line, within the same corridor, that was operating below capacity. Therefore, the corridor-based analysis gives a more accurate prediction of overall Muni operations than would a line-by-line analysis. Page 112, the third full paragraph of the EIR, indicates how cumulative development under the Downtown Plan in conjunction with the planned capacity increases would change future levels of service on Muni and other transit services.

NOTE - Transit

/1/ K. L. (Dan) Wong, Environmental Review Coordinator, Muni, telephone conversation, February 20, 1987.

Comment

"The photographic examples of poor peak hour loading [Appendix C EIR pp. A-49 to A-51] should have included the 'packed sardines' condition on the No. 1 California and the C-cable car lines as well as the No. 30 Stockton rather than the lines serving Market St." (Michael Mah, TRIP)

Response

The photographs shown in Appendix C, Figure C-1, are representative and intended to illustrate peak loading conditions on MUNI which correspond to Table C-1 Passenger Levels of Service on Bus Transit, p. A-48. Peak loading conditions are the same on all bus lines, in terms of the conditions described in Table C-1.

Comment

"p. 112 Please include an update on each transit agency's Five-Year Plan. Please provide specific information on how these plan's are progressing." (Georgia Brittan, SFRG)

Response

The second full paragraph of p. 112 of the EIR referenced by the commenter discusses transit capacity increases projected in the Downtown Plan EIR based on each agency's Five-Year Plan. The Downtown Plan EIR did not assume all capacity increases in the Five-Year Plans but rather assumed limited transit capacity increases, largely only those capital projects already underway and/or partly or fully funded. (See Downtown Plan EIR Appendix J, pp. J.25 – 26 and Responses, pp. C&R-E.30 –34, C&R-E.45 –46 herein incorporated by reference.) Threatened reductions in federal funding were the basis for comments on the Downtown Plan Draft EIR. Responses were provided at that time (see pp. C&R-E.31 to 34). The issue continues to be current, as federal budget cuts continue to be discussed. While there has been talk of reduced federal funding for transit projects, these threats have been offered each year for several years, without major effect in the Bay Region on the federal grants. It is reasonable to assume some continued federal subsidy in the future. In any case, the Downtown Plan EIR states that some federal funding sources are expected to be discontinued by 1989 (p. J.25). The transit operators are expecting less federal subsidy than in previous years. (For example, Section 9 block grant funding is likely to be \$60 – 65 million rather than the \$80 million received in earlier years.)

The Metropolitan Transportation Commission (MTC) now reviews transit agencies' programs for a five-year period and establishes priorities. This Five-Year Regional Transportation Improvement Program reduces financing uncertainties for the various transit agencies.

The San Francisco Municipal Railway expects to be granted its share of these and other funds for projects that were assumed as part of the capacity increases in the Downtown Plan EIR, as well as for many of the projects that were included in the EIR

as transit mitigation measures. Examples include the Muni vehicle replacement program, and articulated trolley coaches and accompanying improvements, both of which are included as priority items in MTC's Section 9 program. Other examples of assumed capacity increases that have been funded are the BART Daly City turnback facility, which is now fully funded as noted above, and BART's additional rail cars which are now on order and funded. Thus, the transit agencies' Five-Year Plans, while they continue to be updated, also appear to be on course and are being funded and implemented. While federal funding will continue to be an issue, the Downtown Plan assumptions remain current./1/

NOTE - Transit

/1/ Material regarding transit funding and Five-Year Plans was obtained in telephone conversations with Gail Bloom, PUC Finance, March 31, 1986 and March 4, 1987, Ted Reynolds, AC Transit Research and Planning, March 28, 1986 and March 4, 1987, Marty Birkenthal, BART, March 28, 1986 and March 4, 1987, Jim Nelson, PUC Planning, March 28, 1986 and March 4, 1987, and Allen Zahradnik, Golden Gate Transit, March 28, 1986 and Jerome Kykendall on March 4, 1987.

TRANSIT COSTS

Comment

"I have reviewed the DEIR for the Federal Home Loan Bank Building (600 California St.) in reference to the Transit Impact Development Fee (TIDF) and have the following comment to make.

"The DEIR makes reference to the project sponsor contributing funds for maintaining and augmenting transportation services. This contribution would be based on the requirements contained in the Board of Supervisors Ordinance Number 224-81 (Transit Impact Development Fee). The DEIR acknowledges, by reference to the Ordinance, that the project is located within the TIDF boundaries and is subject to the Fee. My analysis of the information presented in the DEIR indicates that the Transit Fee could be as high as \$1,563,500.00. The latter figure makes no provision for prior use credits. Provision was made for allocation of common area and adjusting for non-office uses. It also assumes application of the current TIDF rate (\$5 per square foot of increased office use).

"My analysis is of a preliminary nature only, made without benefit of architectural plans or discussions with the project developer. The Final Determination of the Fee would be made on the basis of a more detailed review. A future change in the TIDF rate could also have a significant impact on the Fee that would become due to the City." (Wilbert R. Taylor, PUC)

Response

Comment noted. The EIR includes an estimate of the TIDF rate. As projects generally change between the Draft EIR and the final approved building plans, the actual amount charged for any project would differ from that estimate contained in an EIR. The following is added to the EIR, p. 113 at the end of the second full paragraph:

"The final determination of the TIDF fee would be made on the basis of a more detailed review of architectural plans by the City."

Comments

"p.113 Please include information on the Touche Ross report that showed the proper amount for the TIDF should be over \$9.00 per square foot. Also, what is the amount that has been allocated to MUNI from the General Fund in the past, say for the past 2 to 5 years? Qualitatively has that number increased or decreased in recent years?"

"p. 143 If Ordinance 224-81 (TIDF) is declared invalid the project sponsor should agree to meet it as mitigation regardless of any subsequent measures, unless those subsequent measures would call for meeting the amount of the true cost to MUNI (over \$9.00) as outlined in the last report from Touche Ross." (Georgia Brittan, SFRG)

Response

As stated on p. 113 of the EIR, the Transit Impact Development Fee is intended to recover capital and operating costs of increased peak period transit service associated with new office construction (including conversions in use) in downtown San Francisco. At the time the ordinance was being considered by the Board of Supervisors, an analysis by Bruce Bernhard, chief financial analyst at MUNI, showed

that the net costs of expanded Muni service to meet added peak period demand, using 1980–82 data, were \$9.18 per sq.-ft. of office space. The Board, in adopting the ordinance, set a ceiling for the Transit Fee of \$5.00 per sq. ft. The City's budget analyst did not make a recommendation to the Board of a specific fee level, nor did he advocate or discourage adoption of a fee per se./1/

Section 38.6 of the ordinance requires that the net cost estimate be reviewed annually and adjusted, subject to the limit of \$5.00 per sq. ft., to reflect changing costs of adding, operating and maintaining additional transit service. Subsequent to adoption of the ordinance, Touche Ross & Co., economic consultants to the City, analyzed the net costs as of the base fiscal year, 1980–81, and presented in its "Transit Impact Development Fee Cost Study" (June 27, 1983), a net cost figure of \$8.61 per sq.-ft. A second analysis by Touche Ross using fiscal year 1981–82 data was published under the same title (dated July 1983, as corrected September 9, 1983); this updated study concluded a \$9.82 per sq.-ft. net cost.

The question of who should pay, and how much, for the impacts of downtown development on transit services is not an environmental issue. The decision is in the purview of the Board of Supervisors, as the elected officials of the people of San Francisco. It is the Board of Supervisors that is authorized to set the fee level. The Board has examined this issue, considered the findings of MUNI's finance and accounting experts, and set the fee at a maximum of \$5.00 per sq.-ft. for new office development. The Board subsequently received the findings of the Touche Ross reports. The legislative body, however, has not chosen to change the fee, in its annual determinations. Neither has it chosen to delegate the authority to establish the fee amount to any other City officials.

As stated on p. 143 of the EIR: "The project sponsor would contribute funds for maintaining and augmenting transportation services in an amount proportionate to the demand created by the project, as provided by the Board of Supervisors Ordinance Number 224–81. Should said Ordinance be declared invalid by the courts, the project sponsor has agreed to participate in any subsequent equivalent mitigation measures adopted by the Planning Commission or the City in-lieu thereof, which would apply to all projects similarly situated."

The Transit Impact Development Fee (TIDF), Ordinance 224-81, has been in litigation almost since its inception. On January 21, 1987, the State Court of Appeal ruled that the TIDF was a legitimate development fee and was not a tax. It is possible that the decision may be appealed to the California Supreme Court. Monies are being collected, in accordance with the ordinance and are being deposited in an escrow account, pending resolution of the litigation.

The following is a breakdown of the general fund allocated to MUNI for the past four years: (these figures are budgeted amounts not actual funds received by MUNI)/2/

General Fund Allocation To MUNI	Fiscal Year
\$83 million	1983-84
\$104 million	1984-85
\$112 million	1985-86
\$108 million	1986-87

As can be seen from these figures the dollar amount of General Funds allocated to MUNI increased from 1984-86 and decreased for 1986-87.

NOTES - Transit Costs

- /1/ Bill Courtright, Assistant to the Budget Analyst, MUNI, telephone conversation, March 20, 1985.
- /2/ Bruce Bernhard, Executive Assistant to the General Manager, MUNI, telephone conversation, January 22, 1987.

Comment

"How does project sponsor propose to mitigate the new net annual BART deficit attributable to the project (\$61,900)?" (Gordon Chin, Chinatown Resource Center)

Response

There is no requirement that the sponsor mitigate the net annual BART deficit attributable to the project, and the sponsor has no plans to do so. As discussed on p. 114 of the EIR, the project would generate a total of about \$17,360 in revenue to BART. As stated in the EIR (p. 114, last sentence of the second full paragraph)

"BART's operating deficit per passenger is likely to decline in real terms as planned service improvements become operational in the future." As discussed in the EIR on p. 113, and in the response above the project sponsor will pay a Transit Impact Development Fee of about \$1.08 million; this money goes to Muni.

FREEWAY CORRIDOR ANALYSIS

Comments

"p. 61 The 235 Pine EIR Comments and Responses states that there will be increases in the peak-of-the-peak 'over time'. However, this ignores the expansion of the peak hour into the peak period. In other word, what is thought to be peak hour traffic will become traffic in the peak period. This needs to be dealt with in the EIR analysis.

"There are examples within the text of this EIR that hint at this. For example, see comment below on page 119-120 which shows that the peak hour is at capacity (the example used is the Bay Bridge) and would expand into the peak period. This needs to be clearly re-stated, since it appears we are dealing with more than just peak-of-the-peak, but peak-hour stretching into peak-period.

"p. 119-120 Could drivers be displaced into periods beyond the peak period, (not only beyond the peak hour) because the Bay Bridge is 'functionally at capacity' and because of increase traffic due to the project? Are all projects proposed at this time for approval by the city taken into account when determining this displacement of existing users? If they are not currently taken into account they should be. If done, would they push the increased traffic beyond the 'later portions of the peak period' into what is now thought of as non-peak or after 6:00 p.m.?

"Also, '[S]ome drivers would shift to carpools or transit as a result of cumulative displacement.' How can decision makers be sure of that?" (Georgia Brittan, SFRG)

Response

People who do not use transit or carpools might experience longer delays at the on-ramps to the Bay Bridge because of cumulative traffic including that from the project. The length of this wait would depend upon the time within the peak period when their car arrived at the on-ramp.

Transportation effects of the growth forecast under the Downtown Plan were analyzed for both the peak hour (i.e., the one hour period during which the system is carrying its highest traffic volume) and the peak period (i.e., the two hour period during which the system is carrying its highest traffic volume). Neither of those terms (peak hour, peak period) means that the system is operating at capacity for that entire time period, although volumes may be at capacity for portions of the peak hour or period. By the year 2000, the time period during which the transportation system is carrying capacity volumes could fill the peak hour and extend into the peak period (see Downtown Plan EIR, Vol.1, pp. IV.E.32 and IV.E.34). Traffic generated by this project would contribute to that overall demand upon the transportation system.

The project is accounted for as part of the overall growth in the C-3 District during the 1984 – 2000 time-frame covered in the Downtown Plan EIR. All projects that would be built during the forecast period are thus accounted for in the Downtown Plan EIR forecast and analysis.

The Bay Bridge has been at capacity for many years. There is always a "push-pull" relationship between traffic congestion and transit ridership: driving may appear more attractive if transit fees increase and/or fuel prices drop. However, length of time of commute is an additional major factor (see Downtown Plan EIR Responses Section E.1.4.2, pp. C&R-E.13 – 15). As more drivers appear on the Bridge, causing longer backups, others decide to carpool or use transit, reducing the auto pressure. It is reasonable to assume that some drivers would make this switch.

PARKING

Comments

"Since short-term parking facilities for Chinatown are greatly in demand for evenings and weekends, can the garage be open for community use on evenings and weekends at the same rate structure as Portsmouth Square and St. Mary's Garage?" (Michael Mah, TRIP)

Response

The project sponsor would open the parking facilities of the project on evenings and weekends but would not necessarily structure parking rates to be the same as those at Portsmouth Square or St. Mary's Garage (no rate structure has been decided upon).^{/1/} The City Planning Commission could require the sponsor to so structure parking rates as a condition of project approval.

NOTE – Parking

/1/ Raymond E. Terwilliger, Jr., Federal Home Loan Bank of San Francisco, telephone conversation February 9, 1987.

Comment

"In terms of direct impacts -- traffic, parking. We hope that the site will remain a parking resource for short-term parking for Chinatown -- people who are coming to shop in Chinatown, particularly." (Gordon Chin, Chinatown Resource Center)

Response

Short-term parking spaces approved by the City Planning Commission would be available for public use and would thus remain a short-term parking resource for Chinatown, primarily on evenings and weekends.

Comments

"Proposed project would create an unmet demand for 227 daily parking spaces. Where will these cars park? Describe parking situation in Chinatown as well as just in C-3-0. (Gordon Chin, Chinatown Resource Center)

"Page 109 through 110. The project would create net new demand [of] about 175 long-term spaces and about 15 short-term spaces, a deficit of 227 spaces. The DEIR refers only to C-3-0 District. The present parking situation in Chinatown should be described as well. The parking deficit would definitely adversely impact Chinatown parking." (Michael Mah, TRIP)

Response

The Chinatown neighborhood was included in a parking study conducted by the Department of City Planning as part of a Neighborhood Parking Plan for several neighborhoods in the city./1/ The area surveyed was roughly bounded by Broadway, Columbus, Montgomery, Sacramento, Grant, Washington and Powell. This area is adjacent to the site on the north. The report describes parking in Chinatown as follows, "Parking conditions in Chinatown were found to be extremely poor, with the predominant problem being a pervasive shortage of spaces. Legal on-street supply was occupied at barely under 100 percent. Parking in white and red zones, double-parking and parking across driveways accounts for 18 percent of all on-street parking."

Parking demand and traffic in Chinatown differs from that in the Financial district in that a high demand for parking, and heavy traffic volumes, continue into the evening and on weekends, whereas parking demand and traffic flows in the Financial district are concentrated during peak periods on weekdays. As discussed on p. 120 of the EIR, the project would result in an unmet demand for approximately 227 equivalent spaces. As noted at the top of the EIR on p. 121, "Although the [cumulative] equivalent daily demand would leave about 10% of the parking supply vacant, surges in short-term demand . . . can cause temporary localized overloads of parking facilities within various portions of the downtown, even though parking may be available elsewhere in the downtown." Because the site is located on the edge of Chinatown, some of the parking demand could be met in Chinatown, possibly displacing some of the cars which currently park in Chinatown.

A portion of the Chinatown neighborhood is located in the C-3-District and, therefore, has been included in the discussion of cumulative parking supply and demand, on pp. 120-121 of the EIR. The Downtown Plan EIR contains a discussion of the effects of parking demand on residential and commercial areas adjacent to the

downtown on p. IV.E.41. That discussion is hereby incorporated by reference. In summary, the remaining excess parking demand would be expected to overflow into residential and commercial areas adjacent to the downtown. This could cause parking shortages for mid-day visitors and shoppers within the downtown area. One impact of a spreading of demand into adjacent residential and commercial districts would be increased competition for on-street parking in neighborhoods, which could increase public sentiment for expansion of the residential permit parking program and more rigorous enforcement of parking regulations.

NOTE – Parking

/1/ San Francisco Department of City Planning, Neighborhood Parking Plan 1986 – 1990, published April 1986.

Comments

"Project Sponsor is seeking a variance from Section 155(g) of the Planning Code (requiring rate structures discouraging long-term parking)? Why?" (Gordon Chin, Chinatown Resource Center)

"Page 122. Project sponsor is seeking a variance from Section 155 (g) of the Planning Code which requires rate structures discouraging long-term parking. TRIP is against such a variance." (Michael Mah, TRIP)

Response

In the sponsor's opinion long-term parking would be an asset to the proposed project. The EIR describes and analyses the effects of the project as proposed. It is not the purpose of the EIR to justify the intent or objectives of the proposed project.

As stated on p. 122 of the EIR the project sponsor requested an opinion from the Zoning Administrator as to whether a long-term rate structure could be allowed by the variance procedure. A variance to Section 155 (g) could be allowable. In order to be granted the criteria set forth for variances must be met.

Under Alternative E2, under consideration by the sponsor, there would be about 50 long-term, 48 replacement short-term, 15 short-term spaces proposed to meet the demand generated by the project, and 119 additional short-term spaces (for a total of 232 spaces). (See pp. 289-296, herein.)

Comment

"p. 116 On this page it says 191 spaces would be long-term parking spaces and 41 short-term. On page 69 it says that the 102 spaces that need the CU could be either long or short-term. Page 122 says that the Commission will decide whether the spaces are long or short-term. What is correct?" (Georgia Brittan, SFRG)

Response

The first sentence of the fourth paragraph, p. 116 of the EIR, is revised as follows (new language underlined):

The project proposes about 48 short-term and 82 long-term parking spaces in a three-level basement, with access from Sacramento St. The remaining 102 proposed spaces would be either long- or short-term, subject to a determination by the City Planning Commission as discussed in the last paragraph of p. 33[a].

The project proposes a total of 232 spaces. Of these, the proposed 48 replacement short-term parking spaces may be required at the discretion of the Planning Commission pursuant to City Planning Code Section 102.8(b)16 pursuant to Section 309. Under Section 204.5(c) of the Code, parking area up to seven percent of the gross floor area of the building may be considered accessory parking, in this case about 24,600 gsf, or about 82 spaces are proposed (all of which are proposed as long-term spaces). Remaining parking which is not proposed as replacement short-term parking or accessory parking requires Conditional Use authorization (102 spaces). As noted in the EIR on p. 122 of the EIR, long-term spaces would not meet the requirements of Section 155(g) of the Planning Code.

The Planning Commission in taking action on project approval or disapproval will ultimately decide on the number of spaces and whether they will be long- or short-term.

Comments

"Page 110. What is the reason the project would not respond to the Downtown Plan's policies that discourage long-term parking in the downtown core? TRIP also really wants to discourage long-term parking in the area and would like to see the project's response.

"Page 121. TRIP would like to know reasons for project sponsor's failure to respond to Objective 1, Policies 1, 2, 3, 6 and 8 of the Downtown Transportation Plan. (Michael Mah, TRIP)

"For what reasons does sponsor propose to violate objective policies 1, 2, 3, 6, and 8 of the transportation element of the Downtown Plan." (Gordon Chin, Chinatown Resource Center)

"Since the project site is located in the C-3-0 (Downtown Office) use district, off-street parking not required for commercial uses, and long-term parking is, in fact, discouraged. As long-term is discouraged by all new projects in the area around the project site, the report does not list any truly pressing need as to why between 82 and 184 long-term spaces are needed as an accessory use.

"We find the project sponsor's current parking plan unacceptable as the intent of the policy discouraging long-term parking was, among other things, to discourage commuters from using their private automobiles for their home-to-work trips. As automobile traffic is already at intolerable levels in and around the C-3 Central Business District (CBD), this project, as is, may continue to encourage commuters to use their automobiles for home-to-work trips.

"The following language should be noted in the second full paragraph of page 110:

'The project would not respond to policies of the Downtown Plan that discourage long-term parking in the downtown core.

"P. 122 In addition to the aforementioned comments listed for page 110, the report specifically notes that the project, with it's currently proposed on-site parking facility, would not respond to the following policies under Objective #1 of the Downtown Plan's Transportation Plan:

Policy 1: Existing parking facilities should be encouraged to convert to short-term use and rate structures.

Policy 2: Additional short-term parking should be located in the designated parking belt outside the downtown core.

Policy 3: The provision of long-term parking in and around the downtown core should be discouraged, as well as move replacement long-term parking to the periphery.

Policy 6: Organize and control traffic circulation downtown by channeling vehicles into peripheral parking facilities.

Policy 8: Designates the downtown core as a automobile control zone.

The project sponsor's parking plan also does not respond to parts of the Transportation Element of the San Francisco Master Plan." (K. L. (Dan) Wong, MUNI)

Response

The EIR notes that the proposed long-term parking spaces would not respond to Downtown Plan Policies in the Summary, Project Description and Impacts Chapters of the EIR. (For example, on p. 5 first paragraph, p. 33a last paragraph, p. 69 under Section 155(g), Exception, on p. 121 second and third paragraphs, and on p. 122, first paragraph). Specifically, as stated in the second full paragraph on p. 110 of the EIR, the project would not respond to policies of the Downtown Plan that discourage long-term parking in the downtown core. In the sponsor's opinion long-term parking would be an asset to the proposed project. As noted in the previous response, the EIR describes and analyzes the effects of the project as proposed, without judgment. It is not the purpose of the EIR to justify the intent or objectives of the proposed project. See also above responses concerning parking on pp. 244 – 245 herein.

LOADING

Comments

"Page 118. TRIP is confused by Paragraph 2. 'Vehicles leaving the site would exit on Kearny St.' Does this include commercial vehicles? If so, how would this be accomplished since [the] diagram on Page 25 shows no accessibility between loading docks and Kearny St. If trucks can only exit onto Sacramento St., TRIP foresees a problems with heavy traffic going up the hill into Chinatown, finding a turn onto Grant Avenue too difficult or impossible to handle, then going up another steep grade to Stockton St. Even the steeper grades would prevent the trucks from heading west, so they would have to turn onto Stockton St. joining other vehicles on this already congested street. TRIP would suggest further study of the situation to try to override this problem." (Michael Mah, TRIP)

"Page 118, paragraph 2 'Vehicles leaving the site would exit onto Kearny St.' Does this include trucks? Will trucks leaving turntable to head out interfere with autos at entrance?" (Gordon Chin, Chinatown Resource Center)

"The current proposal is to unload all the traffic onto Sacramento St. -- which you can't get off. You're stuck on Sacramento St. for two blocks, with the Muni, with those big buses, and with a lot of congestion trying to get into the intersection at Grant and into the intersection at Stockton -- let alone through them. Unless that garage and the traffic is redirected onto Kearny St., you are going to have project-specific traffic impacts and Muni impacts of very significant magnitude.

"I would refer you to the map where the Muni stop is shown. The Muni stop is right across the street and the garage is going to flow right into the Muni stop. The trucks are going to be maneuvering into a Muni stop. There are Muni impacts alone, as well as general traffic impacts." (Sue Hestor, SFRG)

"Why does sponsor propose to enter all cars and trucks on narrow Sacramento St.?

"Will there be conflicts between trucks exiting on Sacramento St. and cars entering? Can a car enter while a truck is exiting?

"Will trucks entering on Sacramento block traffic while turning?

"What will be traffic impacts of trucks joining Chinatown traffic as they exit proposed project?

"We are also concerned about the traffic impacts of a project which proposed to accommodate all auto and truck entrance on narrow Sacramento St. as well as forcing all truck traffic to drive through the heart of Chinatown. More discussion of likely delays, gridlock, and traffic jams is needed in the EIR.

"We also hope that commercial loading problems will not be exacerbated on Sacramento St. We all worked many years to get the 55 bus line -- and now the No. 1 California -- electrified. Excessive commercial loading congestion on Sacramento would just be terrible for the 55 bus [#1-California] line. (Gordon Chin, Chinatown Resource Center)

"Page 116. Entrances to parking garages generate a great deal of traffic impediment if queuing in the street occurs. Since the entrance for both trucks and private passenger vehicles is to be on narrow Sacramento St. (with a bus stop across the street), how does the project intend to handle queuing problems? The existing garage, which does not handle heavy commercial vehicles, has both entrances and exists on both Sacramento and Kearny St. The Hartford Building, next door, has its loading docks on Sacramento and traffic is frequently at a standstill while their vehicles are maneuvering in and out." (Michael Mah, TRIP)

"Do trucks entering the Hartford Building's loading docks impede traffic on Sacramento St. when entering? When exiting?" (Gordon Chin, Chinatown Resource Center)

Response

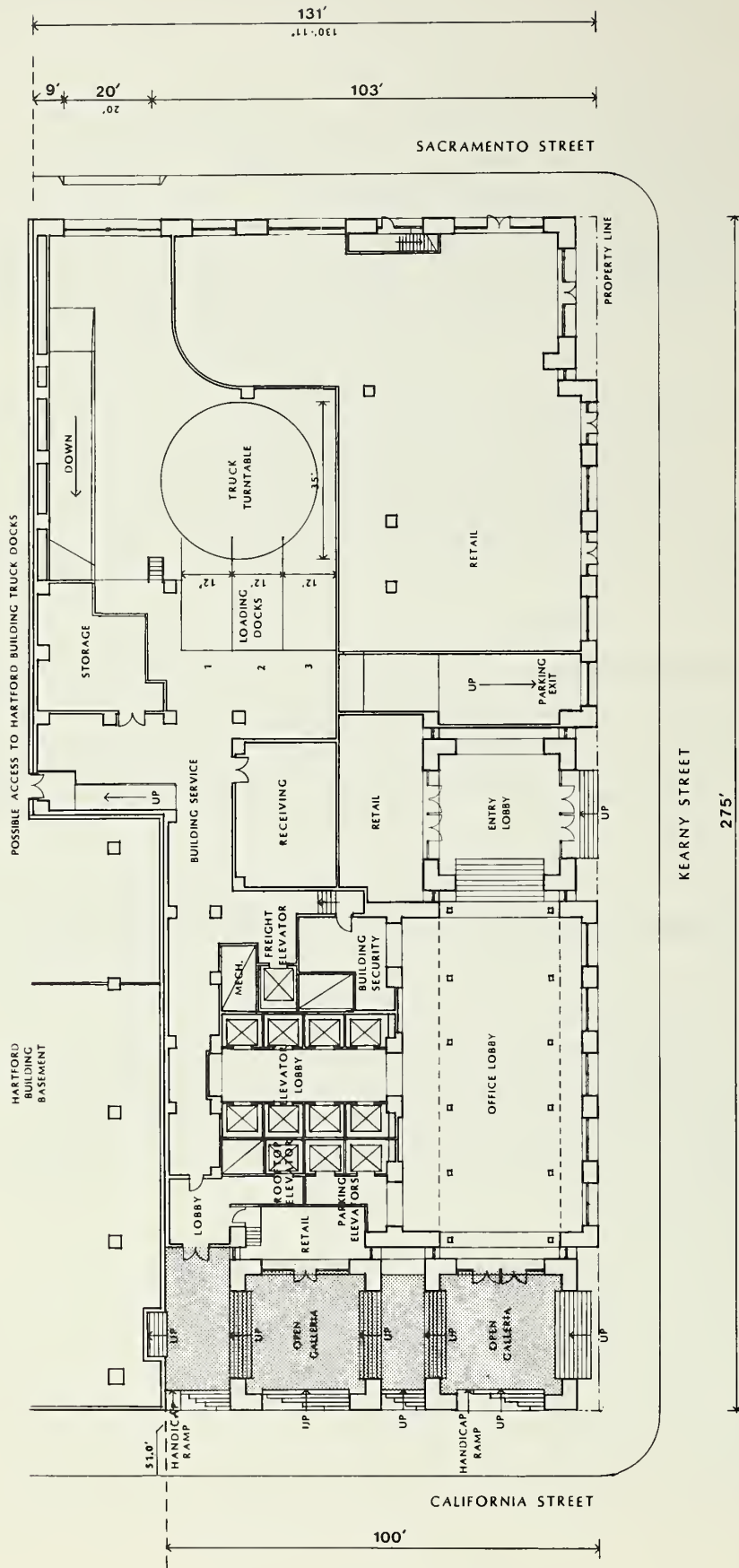
Cars would enter the project garage on Sacramento and exit on Kearny St. Trucks would enter and exit the loading area on Sacramento St. The EIR contains a discussion of project impacts at local intersections on pp. 116 and 118. See Response to Comment on p. 228 herein, as discussed there, the project alone would not cause a change in level of service at the nearest intersections, Sacramento/Kearny and Sacramento/Grant. For a discussion of Alternative E2, including alternative loading access and egress, see pp. 289 – 296 herein.

The first word of the first sentence, of the second paragraph on EIR p. 118 is changed from "vehicles" to "cars." The sentence now reads as follows (revision is underlined):

Cars leaving the site would exit onto Kearny St. and continue northbound through the Kearny/Sacramento Sts. intersection or, turn left (west) on Sacramento St. and pass through the Grant Ave./Sacramento St. intersection.

Figure 3, p. 25, of the DEIR shows the entrance to the parking garage and loading docks as 20-ft. wide. The DEIR project and this figure have been revised to widen the curb cut by about three feet on the eastern edge, reducing the wall width, labeled 'Down' in the DEIR figure to ten feet (it is 12 ft.-wide in the DEIR figure) and moving the eastern wall which leads to the truck turntable, about three feet further east. As shown (on revised Figure 3, p. 251 herein), the entrance to the parking garage and loading docks could adequately accommodate 40-ft. trucks without back-up maneuvers, therefore reducing potential queuing problems on Sacramento St. There could be conflicts between cars entering the garage and trucks entering or exiting the loading docks if more than one truck were entering or leaving; during the one to two minutes it would take for a truck to make the forward movement into the loading dock; or if the truck turntable were to break down, requiring trucks to back out of, or into, the loading dock. This could result in a one- to two-minute delay for cars entering the garage and a corresponding one- to two-minute backup and possible queuing along Sacramento St.

The Muni stop, referenced by the commenter, begins at the northwest corner of Sacramento and Kearny Sts., and extends 60 ft. west, on the north side of Sacramento St. West of the stop are eight loading spaces. As shown on revised Figure 3, p. 251 herein, the entrance to the DEIR project for both cars and trucks would be about 103 ft. from the east property line of the site. With the truck turntable no back-up maneuvers would be required. If the turntable were to break down and back-up maneuvers were required by trucks, trucks still would not maneuver into the Muni stop, given the location of the stop.



 OPEN SPACE

FIGURE 3
GROUND FLOOR PLAN

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates

The comments regarding the existing Hartford Building's loading dock, next door to the site on Sacramento St. are acknowledged. Traffic was observed at times to be at a standstill, for less than two minutes, while vehicles maneuvered in and out of that loading dock./1/

Traffic impacts of Alternative E2 which is under consideration by the project sponsor are described in this document on pp. 289–296. Under this alternative, all cars would enter on Sacramento St. and exit on Kearny St.; all trucks would enter and exit on Kearny St.

NOTE –Loading

/1/ Based on field observations by ESA, Thursday, March 5, 1987, between the hours of 10 am and 1 pm. Peak loading hours are considered to be between 10 am and 2 pm.

Comments

"The project is considering, as a transportation mitigation measure, the provision of a truck turntable off of the project's Sacramento St. vehicle entrance to facilitate commercial truck loading and unloading. However, this department is not aware of any major project in San Francisco which utilizes a turntable for handling commercial delivery trucks. Without some quantitative data from the project sponsor showing that turntables are, in fact, a reliable means of handling commercial loading trucks entering or leaving the project's loading bays will create additional traffic congestion which would disrupt both vehicular traffic and MUNI surface operations on Sacramento St." (K. L. (Dan) Wong, MUNI)

"p. 123 What will happen on a day that the truck turntable does not work?

"p. 144 Is this just one turntable for three loading spaces? Will this completely mitigate the impacts of truck traffic on busy Sacramento St.?" (Georgia Brittan, SFRG)

Response

Macy's downtown department store has a truck turntable off O'Farrell St. The office/retail building currently under construction at Stockton and O'Farrell, will also include a truck turntable./1/ The truck turntable at Macy's has not broken down

during the last three years. If it were to break down there is adequate maneuvering space within the loading area such that back-ups onto the street would not be required./2/

If the project turntable were to break down, trucks entering the loading area would either be turned away and told to return later or, if they were small enough, they could back into or out of the loading docks; such backing movements would cause traffic delays (of about five minutes) and possible related delays in traffic on Sacramento St.

One truck turntable is proposed for the three loading spaces as shown in revised Figure 3, p. 251, herein. As noted on p. 123 of the EIR, the turntable would enable trucks to enter the loading area in a forward motion, without backing-up onto Sacramento St. The turntable would eliminate truck loading impacts on Sacramento St. except if and when the truck turntable were to break down as noted in the response on p. 250 herein.

NOTES - Loading

- /1/ Chi Hsin Shao, San Francisco Department of City Planning, Transportation Planning, telephone conversation, January 13, 1987.
- /2/ Vern Stevens, Dock Superintendent, Macy's, telephone conversation, January 25, 1987.

AIR QUALITY

Comment

"P. 57 When will December 1985 air quality monitoring be analyzed? It's important."
(Susan Bierman, Planning Commissioner)

Response

The data collected in December 1985 has been analysed for the 1985 baseline year. The preliminary baseline analysis corresponds closely to the baseline data used when CO was modelled for this project. Modeling for future CO projections is currently being analyzed as part of the Mission Bay environmental analysis. Results will be available later this year.

NOISE

Comment

"I didn't mention a potential problem with the open space on the roof of the FHLB in my comments. The problem is noise from the mechanical equipment.

"I went up to the observation deck of the Washington/Montgomery Building (a story in itself) and it is very noisy there. It could be a problem on any rooftop open space. In this project, it needs careful consideration. It certainly makes it unpleasant to say nothing of potential damage to peoples hearings [sic]. Perhaps it should have a decibel check."

(Georgia Brittan, SFRG)

Response

As described on p. 22 of the EIR, last paragraph, mechanical equipment would be placed on the nine-story north portion of the project, enclosed by a 19-ft. wall. The proposed rooftop open space area would be on the 18-story portion of the building. There would be no mechanical equipment on the roof of the 18-story portion of the building other than the elevator override. The override would be enclosed within the core containing the elevator shaft, stairways and restrooms, as shown in Figure 6, p. 28 of the EIR. As the override would be enclosed and at the rear (or western edge) of the open space it would not be expected to cause noise levels which would be annoying to open space users.

EMPLOYMENT

Comment

"What percentage of current on-site employees are engaged in 'back office' activities?
What percentage of current on-site employees are San Francisco residents?"

"Of the 798 new office employees, what percentage are projected to be engaged in 'back office' activities? What percentage of jobs are projected to be filled by current San Francisco residents?" (Gordon Chin, Chinatown Resource Center)

Response

Assuming, that 'back-office' refers to standardized routine administrative and support activities, the project sponsor estimates that about 25% of current on-site employees, or about 91, are engaged in 'back-office' activities./1/ It is not known what percentage of current employees are San Francisco residents. Of the 798 new office employees it is not known what percentage would be in back office activities. The proportion of jobs to be filled by current San Francisco residents cannot be precisely determined. The proportion of jobs to be filled by San Francisco residents (both current and new residents) is expected to be similar to that projected for all office space as discussed in the Downtown Plan EIR, and shown on Table IV.D.16, p. IV.D.64. About 50.2% of all C-3 district workers are expected to reside in San Francisco in the year 2000.

NOTE - Employment

/1/ Raymond E. Terwilliger Jr., Federal Home Loan Bank of San Francisco, telephone conversation, February 9, 1987.

Comments

"p. 133 How many of these 1,167 office workers in the new building would be FHLB employees in the completed project? There are now 368 FHLB employees. Are there some scattered around the city currently? How many and where are they working? How many new jobs would be created within the FHLB. What type of jobs would these be if some are being created? Please break down by occupation and salary range. How many are currently San Francisco residents and how many of the new employees would be San Francisco residents. Would the project comply with jobs requirements under the DTP Section 164 (Employment Brokerage) and the additional sections in the code added by the passage of Prop M?" (Georgia Brittan, SFRG)

Response

Of the projected 798 new office employees, the majority are expected to be existing employees of the bank transferred from other locations. There are currently about 208 Federal Home Loan Bank (FHLB) employees in office space in the 580 California St. building. There are no other FHLB employees in the City./1/ As noted on p. 133, third paragraph of the EIR, there would be 1,167 office workers in the proposed

building; a net increase of 798 office employees. The FHLB employees in the 580 California St. building, in combination with the existing 368 FHLB employees in the 600 California St. building would total about 576 employees, most or all of whom would be expected to relocate in the proposed building. Some new FHLB jobs would be created; however, the number and type of jobs is unknown at the present time. Employees of the project would likely have the same percentage mix of 'back-office' employees as presently exist on site (25% as previously noted). The salary ranges of FHLB employees are proprietary information and not available from the bank./1/ It is not known how many existing FHLB employees are currently San Francisco residents./1/

Residence patterns of employees in the C-3-0 District are discussed on p. 137, second paragraph of the EIR. For new employees, the percentage of San Francisco residents and non-residents is expected to be similar to that shown in Table IV.D.16, p. IV.D.67 of the Downtown Plan EIR.

The project sponsor must comply with the employment requirements of Planning Code Section 164, as stated on Table 2, p. 68 of the EIR. Proposition M establishes eight Priority Policies. These policies are listed in the response on p. 194 herein. As noted is that response, "Prior to issuing a permit for any project which requires an Initial Study under CEQA . . . the City is required to find that the proposed project . . . is consistent with the Priority Policies. The City Planning Commission would make a determination of the project's conformance with the Priority Policies."

NOTE - Employment

/1/ Raymond E. Terwilliger Jr., Federal Home Loan Bank of San Francisco, telephone conversation February 20, 1987.

OFFICE VACANCY RATES

Comments

"p. 62 Forecasts of space should state in the EIR how much office space is expected to be approved, built and occupied by 2000. This is important in the context of the current high vacancy rates in San Francisco.

"p. 133 There is no discussion of the vacancy rate in San Francisco. Please include information on the current rate in the C-3, Downtown, with sublease vacancies included, without sublease vacancies included and by type of office space (i.e., back office, front office).

"The vacancy rate is important in light of the fact the FHLB is not occupying the entire building A discussion is needed of why the FHLB needs to have a larger building. Why is it not possible for the Bank to move to a vacant building that could provide expanded space needs? For example, why is it not feasible to move to 345 California St. (recently opened) or 388 Market St. (soon to open) and rent out their existing space? This information should also be included in the no project alternative." (Georgia Brittan, SFRG)

Response

As stated in the EIR on p. 62, second full paragraph, "The Downtown Plan EIR provides forecasts of amounts of space likely to be found in the C-3 district in the future and of the number of employees likely to be working in the C-3 district in the future." As noted, "Table IV.B.10, page IV.B.33 shows about 125,243,000 sq. ft. of space in the year 2000, of which about 78.9 million would be in office uses."

In light of the development cap passed by the Board of Supervisors in 1985, superseded by the recent passage of Proposition M it may be assumed that for a period up to about 14 years a maximum annual amount of 475,000 sq. ft. could be approved. After a backlog of previously approved projects is cleared (it is anticipated that this could take up to 14 years), the maximum annual amount of office space which could be approved would be 950,000 sq. ft.

The latest Coldwell Banker survey (December 31, 1986) indicates an office vacancy rate in downtown San Francisco of 18.1% (this is an increase from the reported vacancy rate of 15.7% in March 1986, 16.2% in June 1986 and 16.6% in September 1986). The Coldwell Banker Survey reports the national downtown office vacancy index as of June 30, 1986 as 16.8%. The index covers major competitive multi-tenant office buildings of greater than 30,000 square feet. It excludes government-owned buildings, medical buildings, office condominiums and buildings that are clearly not competitive in today's marketplace.

The latest Cushman & Wakefield survey (December 31, 1986) indicates an office vacancy rate in the Financial District of 16.5%, as compared to 12.9% in December 1985.

By comparison, office vacancy information was also collected by the Rubicon Group and is available as of December 31, 1986. The vacancy rates reported include all existing vacant space that is anticipated to become available during the first three months to 1987. In the Central Financial District 13.22% of all space was reported as vacant (4,096,837 square feet), with 9.46% (2,931,720 square feet) from direct space and 3.76% (1,165,497 square feet) from sublease space. In the South of Market Area 18.55% of all space was reported as vacant (1,511,303 square feet) with 17.23% (1,332,400 square feet) from direct space and 2.33% (180,098 square feet) from sublease space. Overall office vacancy in San Francisco was reported to be 13.25%.^{2/}

Since December 1985, the Department of City Planning has been preparing a data base of the City's C-3 office space inventory. As of March 1986, the Department's data base had up-to-date first quarter (January-March 1986) data on 60.6% (176 office buildings) of the total C-3 office space (38,694,086 sq. ft. out of a total inventory of 63,832,650 sq. ft.). The inventory includes buildings recently completed and buildings available for lease. The data base includes location by street address, net rentable sq. ft. of office space, average floor size, vacant sq. ft. and vacancy percentage of each building. The information was compiled from the Department's files and from data supplied by various real estate firms. The data base tabulations are available for public review at the Department of City Planning, 450 McAllister St., Fourth Floor, San Francisco. The overall office vacancy rate in the downtown (C-3 district) according to the Department's data base was approximately 16.5% as of March 1986.

As stated in the EIR on p. 18, first paragraph, last sentence, "The project sponsor's objectives are to develop high-quality office and retail space, provide replacement parking and alleviate existing space needs for its bank operations." Where businesses locate is not regulated and is based on an individual developer's choice. The decision regarding location may be based on a variety of economic or site-specific reasons. In this case, the bank owns the existing 600 California St. building and land; likes the location and wishes to develop its own property, in order to consolidate and expand its existing San Francisco operations.^{1/} The question of project feasibility

although of some interest to the commenter and the public, it is a socioeconomic issue and does not relate to physical environmental impacts as defined by CEQA.

NOTE – Office Vacancy Rates

/1/ Raymond E. Terwilliger Jr., Federal Home Loan Bank of San Francisco, telephone conversation, February 20, 1987.

RESIDENCE PATTERNS AND HOUSING

Comment

"p. 11. Think document is in error relying on Downtown Plan EIR regarding 'no significant impact' on the region's housing supply as a result of cumulative downtown growth. (Susan Bierman, Planning Commissioner)

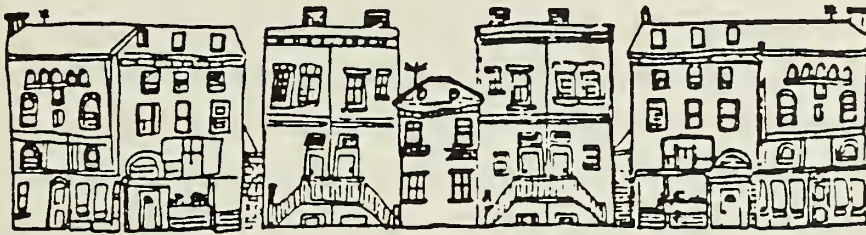
Response

The Downtown Plan EIR did not find that the effect of cumulative development on housing demand would be a significant impact. Fulfillment of the Office Affordable Housing Production Program (OAHPP), Ordinance No. 358-85, requirements to provide housing, or cause housing to be provided, in relation to the demand for new housing in the City caused by new development, mitigates a project's impact on housing demand. This ordinance requires that a project sponsor construct housing, including at least 50% affordable to households of low- and moderate-income for at least 20 years, or pay an in-lieu fee based on the additional office space which would be added by a project. The 600 California St. project sponsor would contribute funds, in accordance with OAHPP.

Comments

"Page 16, paragraph 2. Note net housing loss referenced in 'The Story Behind San Francisco's Shrinking Housing Supply: A Preliminary Report. 1975 – 1985' for more accurate reporting of recent San Francisco housing trends (see attached copy). (Gordon Chin, Chinatown Resource Center)

"p. 136 'While there would be an increase in San Francisco's housing supply, the private market is expected to be unable to supply much new housing that would be affordable to a large segment of the City's population.'



**THE STORY BEHIND
SAN FRANCISCO'S
SHRINKING HOUSING SUPPLY:
A PRELIMINARY REPORT, 1975-1985**

many conversions are done illegally -- without a Conditional Use Permit approved by the City Planning Commission. Many conversions, both legal and illegal, also deny the City the benefit of hotel taxes.

Existing enforcement powers are widely scattered throughout various City agencies, which lack the staff or sufficient interest to remedy the conversion of housing to other uses. The existing enforcement process is a labyrinth that is not only difficult to comprehend but partly responsible for a backlog of cases. Although the City recognized this problem and created a "Code Enforcement Task Force", little has been accomplished.

To promote the preservation of existing affordable housing, the San Francisco Housing and Tenants Council's recommendations include:

- o Expanding or reorganizing the resources of various City Agencies to clear the backlog of housing-related enforcement cases;
- o Expanding the Code Enforcement Task Force to include community representatives;
- o Creating financial incentives not to convert residential units to other uses;
- o Creating a private right of action for individuals and housing preservation or improvement nonprofit organizations to enforce the Planning Code, such as currently exists in the Hotel Conversion and Demolition Ordinance;
- o Directing the Department of City Planning to use all available data from other government units in preparing its annual report for the Housing Information Series, including information on legal and illegal conversions;
- o Conducting public hearings to discuss and correct deficiencies in the Residence Element of the City's Master Plan;
- o Making substantial changes in the Conditional Use process as well as providing for follow-up to ensure compliance with conditions imposed by the City;
- o Requiring a Conditional Use Permit for the merging of two or more housing units into a single unit;
- o Eliminating or severely restricting the "Summer-Winter" loophole in the Hotel Conversion and Demolition Ordinance;
- o Forming a small task force to address the problem of corporate guest suites.

EXECUTIVE SUMMARY

In late 1985 the San Francisco Housing and Tenants Council undertook a City-wide study of housing problems, and, although research is continuing, the findings to date -- that the housing crisis has worsened -- compel the issuance of a preliminary report. The Council's conclusion that the housing crisis has worsened is supported by the Bay Area Council, which early in 1986 reported that 71% of San Francisco households cannot afford a median priced rental unit; that the City's Housing stock is some 164,000 units short of the demand generated by local employment; and that for renters, the situation has grown considerably worse since 1980.

The City of San Francisco has reported a net increase over the last decade of 12,144 units of housing, a high percentage of which is not affordable housing. However, the City's report failed to take into account that during the same period, 17,197 units of housing were lost by conversion of housing units to other uses. In fact, the City's housing inventory is more than 5,000 units less today than it was ten years ago, despite the objective of preserving and increasing the housing inventory as set forth in the City's Master Plan.

The Residence Element of the City's Master Plan recognizes the need to preserve existing housing, and particularly low- and moderate-income units by preserving the quantity, quality, and affordability of existing housing. Clearly, that objective has not been met. Thousands of units of affordable residential housing have been converted to other uses, including conversions to:

- o Condominiums
- o Corporate Guest Suites
- o Bed and Breakfast Inns
- o Tourist Rooms
- o Temporary Rooms for the Homeless
- o Offices, and Other Commercial or Institutional Uses

Where property owners have followed the legal process to convert residential units, the Planning Commission has often granted Conditional Use Permits for the flimsiest of reasons, despite the provisions of the City's Master Plan regarding housing. However,

BAY AREA HOUSING DATA

The affordability of housing is a function of not only rents, home prices and interest rates, but also of household income. This month's data insert examines in detail income levels in the Bay Area and their relationship to housing affordability.

Median Household Income

The median household income for the nine county region in July of 1986 was \$28,810. As the accompanying table shows, Marin County (\$36,182) remains the wealthiest county in the Bay Area, while San Francisco has the region's lowest median household income (\$22,435). San Francisco's household income figure reflects the fact that 41% of the households in San Francisco are single-person households. Alameda, Solano, Sonoma, and Napa counties also have median household incomes below the Bay Area median.

The median household income data presented here is an estimate prepared by Urban Decision Systems (UDS) using recent income data collected by the Census Bureau, the U.S. Bureau of Economic Analysis, and the California Department of Finance. The 1980 Census is the latest authoritative data collected from individual households, and that data is presented in the accompanying table. The UDS estimates are the most current update of Census income figures.

Median Family Income

The U.S. Department of Housing and Urban Development (HUD) makes an annual estimate of median family income. This is done to help determine eligibility for federal housing assistance. The State of California and many local governments also use these income figures for their housing programs. However, HUD does not make an estimate for the nine-county region, but instead calculates income estimates for the four Primary Metropolitan Statistical Areas (PMSA) that make up the Bay Area. These estimates are presented in the accompanying table, and are compared with the UDS estimates for median family income for the nine counties.

Family income figures are significantly higher than household income figures because family income is defined for only those households with two or more related individuals. Household income, on the other hand, includes single-person households, which tend to earn less than family households where multiple wage earners are more common. However, the number of non-

Median Household Income

<u>County</u>	<u>1986</u>	<u>1980</u>
Alameda	\$26,002	\$18,700
Contra Costa	32,322	22,875
Marin	36,182	24,569
Napa	25,794	18,887
San Francisco	22,435	15,867
San Mateo	32,483	23,175
Santa Clara	33,206	23,370
Solano	26,377	19,264
Sonoma	25,034	17,734
BAY AREA	\$28,810	\$20,608
CALIFORNIA	\$25,044	\$18,248

Source: 1986 - estimate, Urban Decision Systems

1980 - U.S. Census

Median Family Income, 1986

<u>County</u>	<u>UDS</u>	<u>HUD</u>
Alameda	\$31,637	
Contra Costa	37,489	
Marin	43,128	
San Francisco	28,393	
San Mateo	38,167	
S.F.-Oakland PMSA	\$34,360	\$36,300
Solano	\$29,432	
Napa	31,762	
Solano-Napa PMSA	\$30,056	\$31,500
Santa Clara	\$37,602	\$39,200
Sonoma	\$29,321	\$30,500
BAY AREA	\$34,343	n.a.
CALIFORNIA	\$29,468	\$30,600

Sources: Urban Decision Systems (UDS)
U.S. Department of Housing
and Urban Development

Bay Area Housing Affordability

family households where multiple wage earners are more common. However, the number of non-family households continues to grow, and in some counties it comprises a significant portion of housing consumers. For instance, in San Francisco, families represent less than half of all households. Thus, median household income is a better measure for determining overall housing affordability because it measures a broader group of housing consumers. In applying its figures, HUD further defines family income by household size.

	Median household income	Median sales price	Average mortgage rate	Income required to buy	Percent unable to afford
1986	\$28,810	\$166,011	10.00%	\$50,431	79.8%
1985	\$28,636	\$138,075	11.84%	\$47,517	77.9%
1980	\$20,608	\$104,376	13.11%	\$38,910	84.7%

	Median household income	Median advertised rent	Income required to rent	Percent unable to afford
1986	\$28,810	\$695	27,800	48.1%
1985	\$28,636	\$695	27,800	48.5%
1980	\$20,608	\$395	15,800	33.6%

Sources: Urban Decision Systems, California Association of Realtors, Federal Home Loan Bank Board, and Bay Area Council.

Housing Affordability: 1980 to 1985

Increases in household income in the first half of this decade have helped to improve the affordability of home ownership, but income growth has not kept pace with increases in rent levels and rental housing has become less affordable. Between January 1980 and July 1985, the median household income in the Bay Area increased 39%, home prices rose 32%, and interest rates dropped almost one and a half points. This increased the affordability of for-sale housing, as shown in the accompanying table. However, during the same period, advertised rents increased 76% and the affordability of rental housing decreased significantly.

1986 Reverses Five-Year Trends

In the last year, median household income has increased only .6%, and the five-year affordability trends for both rental and for-sale housing have reversed--rent levels have stabilized and home prices have risen. The Bay Area median advertised rent has levelled off at \$695 for a two-bedroom apartment (refer to last month's data insert), and thus households that have gained income now find rental housing more affordable.

The affordability of home ownership, on the other hand, has worsened in the last year. Although falling interest rates at first helped improve affordability, the increased number of homebuyers entering the market has now driven home prices up more than 20% in the last year. Much of this increase has occurred in the last few months.

A Word on the Data

Housing affordability is determined using income data provided by Urban Decision Systems. For more information on their income estimates, contact Jim Paris at 213/820-8931, P.O. Box 25953, Los Angeles, CA 90025. The data on home prices is supplied by the California Association of Realtors who collect data from multiple listing services throughout the state. The average mortgage rate is the average effective rate for all home mortgages closed in June of each year as published by the Federal Home Loan Bank. Rent figures are from the Bay Area Council's quarterly survey of advertised rents. For-sale affordability is determined as three times annual housing costs on a fixed-rate 30-year mortgage with an 80% loan-to-value ratio and property tax and insurance costs equal to 1.6% of the value of the home. An affordable rent is defined as 30% of annual income.

"This passage states in clear language that affordability of housing is a problem in San Francisco. That is commendable since the language on the housing problem in DEIRs has often been softened and somewhat fuzzy. However, amplification is needed. Attached is information from the Bay Area Council on affordability. Please note that over 70% of the people in the Bay Area cannot afford housing. Please include this report in the C&R. Also attached is the Executive Summary from The Story Behind San Francisco's Shrinking Housing Supply: A Preliminary Report, 1975-1985, published by the San Francisco Housing and Tenants Council. Please include this as well and comment on the summary.

"Please talk about this in relation to the housing proposed for Mission Bay and the increase in employment in San Francisco as discussed in the section on cumulative transit impacts above (p. 106), in light of the fact that there will be more than 30,000 more workers living in San Francisco (as projected by the DTP EIR) and little affordable housing." (Georgia Brittan, SFRG)

Response

The first commenter refers to p. 16, paragraph 2 of the EIR which discusses a summary of the impacts of Alternative D and E. Page 61, second paragraph refers to the Downtown Plan EIR forecasts of housing; it is assumed the commenter was referring to the latter. The commenter submitted a two page summary and the entire 30 page report entitled, The Story Behind San Francisco's Shrinking Housing Supply: A Preliminary Report, 1975-1985, San Francisco Housing and Tenants Council, no date. (The title page and summary of the report are reproduced on pp. 260-262 herein. The complete report is on file at the Department of City Planning, Office of Environmental Review, 450 McAllister St).

The San Francisco Housing and Tenants Council (SFHTC) The Story Behind San Francisco's Shrinking Housing Supply: 1975-1985, referenced by the commenter, challenges the information contained in the Housing Information Series: 1985 report by the Department of City Planning (DCP). The Council claims that while 12,144 net additional units were constructed from 1975-1985 (11 years), as stated in the Department's report, there was also a loss of 17,197 units through conversion to other uses. Thus, the SFHTC report claims (on p. 1) that the City's housing inventory is more than 5,000 units less today than it was ten-years ago. While the

SFHTC report contains some valid pieces of information that augment the picture of changes in the City's housing inventory presented in the Department's report, it has several errors. These are summarized as follows:

1. Their assumption that the 4,910 condominium conversions represent a loss of housing stock. Eventually, the reader finds this is an assumed loss of affordable rental housing (p. 6). Initially however, the reader is led to believe this is an actual loss of units. The manner in which the SFHTC report treats the issue of condominium conversions is so misleading that it damages the credibility of the remainder of the report. The authors seem to confuse the issue of quantity of housing, that is, the actual number of dwelling units, with type of tenancy and affordability. These are very separate items. The SFHTC report ignores the fact that condominiums are the housing of choice for a number of households who either do not want or need, or cannot afford a single-family home, but still want the advantages of ownership. The SFHTC report assumes that the converted units were all "affordable" rentals. In actuality, conversions tend to involve nicer buildings in higher income neighborhoods. The SFHTC report does not mention that many converted condominiums eventually become rental units (53% of the total in one study, Residence Element, p. 117). Of course, this process would usually result in higher rents. Finally, the SFHTC report does not acknowledge the effect of the 200-unit annual limit on condominium conversions and other restrictions on eligibility for conversion permits in reducing the effect of conversion on the rental stock.
2. The SFHTC Report's implication that the average annual numbers of residential hotel units and condominium units converted from 1975–1985 would continue to be the same into the future.
3. The omission from the SFHTC report of discussion of the effect of the City's Residential Hotel Conversion and Demolition Ordinance (adopted in 1979) and Condominium Conversion Ordinance (adopted in 1983) in reducing the previous rate of loss rental housing. However, illegal conversions do occur, although not in large numbers.

4. The omission of an explanation of numbers of residential hotel units converted since 1975. The SFHTC report states that 7,688 single room occupancy housing units were lost, and this figure comprises 45% of claimed lost units. These numbers cannot be reconciled with the figures in the Residence Element on p. 118 or in the November 1985 status report on the Residential Hotel conversion and Demolition Ordinance.
5. The lack of recognition of the creation of new housing units through the addition of illegal "second units" in residential zones and the conversion of commercial and industrial space to live work units. It is logical that if one is going to estimate the number of illegal conversions to commercial use, as the SFHTC does, that one also recognize at the same time, that illegal additions are continually increasing the housing stock.
6. Another situation not discussed in the SFHTC report that has increased the housing inventory, although the increase has not been quantified, is the rehabilitation of formerly vacant, uninhabitable units, particularly in the Tenderloin.

As explained in the Department of City Planning letter to the Board of Supervisors of December 19, 1986, the Department's annual Housing Inventory Report covers only legal changes in the housing stock based on city records. The Department uses the census to adjust the housing count every 10 years. The last adjustment, based on the 1980 census, resulted in a reduction of about 6,000 units in the inventory, averaging 600 per year. With increased restrictions on the demolition and conversion of existing housing, the Department expects that the next census adjustment will be lower. Current restrictions on conversion of housing and land use controls include:

1. Residential Hotel Unit Conversion and Demolition Ordinance, passed in 1979.
2. Condominium Conversion Ordinance, passed in 1983.
3. Neighborhood Commercial Interim and Pemanent Controls, in effect beginning early 1985.

4. Interim Planning Code Controls requiring Conditional Use authorization for conversion of any residential unit to commercial use, citywide.
5. Use of the discretionary review process to bring reductions of dwelling units to the Planning Commission for review.
6. The City's Rent Stabilization ordinance, passed in 1979, includes provisions allowing only "just cause" evictions in regulated units. (This does not prevent illegal conversions but makes them more difficult).
7. The practice of the Department of City Planning placing a "hold" on demolition applications until the replacement building is approved.

It should be noted that while it is the City's policy to preserve the existing housing stock, it is not City policy to prohibit absolutely all demolitions and conversions. The Conditional Use requirements and the Residence Element policies do allow for demolition and conversion under limited circumstances based on each individual case.

The commenter states that "over 70% of the people in the Bay Area cannot afford housing" based on the Bay Area Housing Data dated September, 1986 by the Bay Area Council (BAC) as a reference source (see p. 265 of this document). The commenter's statement is simplistic and misleading. The second page of the BAC report shows that based on income alone, about 80% of the households in the Bay Area would not, in a hypothetical situation, be able to purchase a median priced home with standard mortgage financing without paying more than one-third of their income for housing. This is a useful, but oversimplified indicator of home ownership affordability. Its usefulness is mainly for comparative purposes such as evaluating the effect on affordability over time of changes in interest rates, home prices and household incomes. It would also be a useful measure for comparing affordability in different parts of the country, state or the Bay region. It is important to note that the statistic referenced by the commenter is a measure of home ownership affordability and does not apply to the affordability of rental housing, as implied by the commenter.

The BAC report is oversimplified in its measure of home ownership affordability for several reasons. First, median household income includes the incomes of many households that are not in the market for home ownership and may never be. Examples of these households include people from groups such as young singles, elderly, students, unemployed persons, disabled and households temporarily in the area. A more informative measure would be the median income of the household types more likely to pursue home ownership.

Second, the report ignores the importance of equity in an existing home or other assets in the ability of some households to afford for-sale housing. A portion of households can afford to purchase a more expensive home than their income alone would indicate, due to equity in a present home or other assets that they could apply to the purchase price.

Third, home ownership affordability is also sensitive to fluctuations in interest rates. This can be seen in the BAC figures which show that home ownership is more affordable today than it was six years ago in 1980. Generally, a better measure of housing affordability can be obtained from an analysis of the affordability of rental housing.

According to the BAC data, rental housing is relatively more affordable than home ownership. Slightly more than half of all households (about 52%) are able to afford the median priced, advertised two-bedroom apartment without paying more than 30% of their gross income for rent. Thus, there is a segment of the Bay Area housing market which (based on income alone) can afford to rent an apartment but cannot afford to buy. In the last two years, rental affordability has been stable and vacancy rates have increased providing renters with more choice. However, over the last six years, the affordability of rental housing declined (see BAC report, p. 2).

The rental affordability measure used in the BAC report is also a simplification. It is a measure of the affordability of a hypothetical, advertised apartment of a specific size. It is not a measure of what households are actually paying for rent. The best source of that information is the U.S. Census, but it is only available every 10 years. Since the BAC report uses advertised rents, it "tends to overemphasize newly-constructed units, as many older, lower priced apartments are leased without

newspaper advertising."/1/ In a city with a rent control ordinance like San Francisco's, the difference between actual rents being paid and advertised rents would be more significant, than in the Bay Area as a whole.

The choice of the two-bedroom apartment as an indicator is also less appropriate when looking at San Francisco's situation because according to the 1980 Census, 41% of all San Francisco households are occupied by a single person. Over one-half of San Francisco households have two persons. Thus, it would be more appropriate, from a San Francisco perspective, to compare median incomes to the median priced one-bedroom or studio apartment which would adequately house the majority of the City's households.

The above discussion is meant to demonstrate the complexity of the housing affordability problem. The commenter's quote from the 600 California Draft EIR is accurate in its assessment that much of new housing supplied by the private market would not be affordable to a large segment of the City's population.

The Mission Bay Proposal for Citizen Review published in January, 1987 proposes that at least 30% of the housing built on the site be available at below market-rate prices/rents. Such a housing subsidy program would produce 2,311 units, or 3,081 units at a 40% subsidy rate. At this time, the amount of subsidy has not been identified to determine the income levels (e.g., low, moderate, middle) at which units would be available. Housing in Mission Bay, subsidized or otherwise, would expand the City's housing supply. It is not possible to determine in detail the effects Mission Bay would have, based on the available information, in a city-wide or regional context. More information on this topic will be forthcoming in the Mission Bay EIR analysis, which will use detailed forecasts of employment and housing development for the timeframe studied, as well as the many other variables important in considering future housing market conditions.

NOTE – Residence Patterns and Housing

/1/ Bay Area Council, December 1986, Housing Data Sheet.

Comment

"p. 23 The office space in the Hertz-Rent-a-Car is clearly accessory office space. It should not be counted in figuring out the net amount of office space. This changes the OAHPP computation." (Georgia Brittan, SFRG)

Response

The existing office space occupied by the project sponsor is 95,800 gsf; a Hertz-Rent-A-Car office occupies 800 gsf, for a total of 96,600 gsf of office space on the site, as reported in the DEIR. The Hertz office functions more like retail space. The Hertz-Rent-A-Car space has been subtracted from the total existing office space on-site which would result in 216,900 gsf of net new office space added by the project (312,700 proposed - 95,800 existing = 216,900 gsf). The OAHPP requirement would thus be 84 housing units compared to the stated requirement of 83 housing units.

The EIR is revised accordingly. Eighty-three units is changed to 84, in the EIR on p. 68 first paragraph under Planning Code Requirements, p. 154 fourth paragraph, p. 158 third full paragraph, p. 161 first partial paragraph, and p. 164 under Project Housing Units Requires (OAHPP).

This difference of 800 gsf of office space (that is, more existing retail and less existing office) would not result in measurably different impacts from the project.

Comments

"CCBH's [Chinatown Coalition for Better Housing] general membership of up to 400 people feel the proposed project of such magnitude is an encroachment into Chinatown, a community of primarily residential units and neighborhood businesses. The project may be an incentive for other land development speculations which will add on to development pressures already threatening the existing affordable housing stock in Chinatown." (Lorraine Lowe, Chinatown Coalition for Better Housing)

"How does Bank proposed [sic] to fulfill its Office Affordable Housing Production Program responsibilities?"

"Will childcare services or fees by [sic] targeted to Chinatown? How about OAHPP funds? By what mechanism?" (Gordon Chin, Chinatown Resource Center)

"Should the proposed project be built, CCBH strongly urges that the OAHPP requirements be directed toward developing affordable housing units in and around Chinatown."
(Lorraine Lowe, Chinatown Coalition for Better Housing)

Response

The comments are acknowledged. As discussed in the response on pp. 205–206 herein, the Chinatown Permanent Controls adopted by the City Planning Commission on February 19, 1987, regulate the area directly north and west of the site. The permanent controls, if implemented by ordinance by the Board of Supervisors, and signed by the Mayor, would amend the San Francisco Master Plan and effect a comprehensive rezoning of Chinatown. Master Plan goals and/or policies as implemented by related City Planning Code sections, encourage retention of Chinatown's mutually supportive functions as neighborhood, capital city for Chinese Americans, and visitor attraction; preserve the distinctive urban character and cultural heritage of Chinatown; conserve and promote new development of housing in Chinatown; support existing commercial uses; recognize special needs of Chinatown residents; manage transportation impacts; and protect Chinatown's relatively sunny and wind-free climate. The controls are intended to maintain the existing balance of uses in Chinatown, (of which housing constitutes about 50%) and to prevent encroachment due to C-3 district office development into Chinatown.

The project sponsor proposes to pay the in-lieu fee to meet the OAHPP requirement. Section 313(f)(1) of the City Planning Code requires that the "in lieu fee shall be revised effective January 1 of each year, commencing on January 1 following the effective date of this Section, by the percentage increase or decrease of the Building Cost Index of the Cost Indices for Twenty Cities published by McGraw-Hill, Inc. or its successor since January 1 of the previous year." The formula is as follows/1/:

Net additional gross sq. ft. office space x \$5.34 = Total Fee. Therefore, pursuant to Section (f)(1) of the OAHPP ordinance the adjustments are made in the following manner:

Building Cost Index Percentage Change

January, 1985 to January 1986/2/:	+1.0%
-----------------------------------	-------

<u>In Lieu</u> Fee Amount (1985)	\$5.34
----------------------------------	--------

<u>In Lieu</u> Fee Amounts (1986)	
-----------------------------------	--

(Percent Change x 1985 Amount):	<u>\$5.39</u>
---------------------------------	---------------

The project as proposed would result in an in-lieu fee of about \$1,169,091 (216,900 gsf x \$5.39) which would be deposited into the affordable housing fund to be administered by the City Planning Director (Section 313K.1.m.). It is not known at the present time whether such funds would be targeted toward Chinatown.

The project sponsor would meet the childcare requirements of the City Planning Code, in a manner to be determined, as noted in the EIR, on p. 68. Also, please see the response on pp. 204-205, herein, regarding childcare requirements of the Planning Code.

NOTES - Residence Patterns and Housing

/1/ An Evaluation of the Office - Affordable Housing Production Program (OAHPP), Ordinance 358-85, San Francisco Mayor's Office of Housing and Economic Development in cooperation with the Department of City Planning, January 1987.

/2/ Engineering News Report, McGraw-Hill; January 16, 1986

GROWTH INDUCEMENT

Comments

"p. 137 There needs to be information on the growth inducing affect of the project on Chinatown in general and Sacramento street in particular in terms of causing change in retail use." (Georgia Brittan, SFRG)

"On 138, I think you need to talk about the growth-inducing impacts on Sacramento St. If the project stays as it is -- and I hope that the project changes -- what you need to be talking about here is that the project could encourage similar development on lots, including smaller lots assembled for development.

"You say that on Page 138 when you talk about growth-inducing impacts. Then it doesn't make a connection into a finding of significance." (Sue Hestor, SFRG)

Response

The EIR describes growth inducing impacts of the project on pp. 137-139, including a discussion on p. 138, second paragraph, of the potential, "to encourage similar development on lots (including smaller lots assembled for development) currently occupied by low- or mid-rise buildings containing businesses support services."

Development along Sacramento St. directly north of the site, falls into the latter categories. As noted on pp. 45-46 of the EIR, the Chinatown Plan and rezoning Area was regulated by the Chinatown Interim Controls at the time of DEIR publication. Permanent controls were approved by the Planning Commission, on February 19, 1987. Both sets of controls include the north side of Sacramento St. directly north of the site and Sacramento St. adjacent to the site on the west. As shown on Figure 14, p. 44 of the EIR, Planning Code Use Districts and the Planning Code Height and Bulk Districts, including those within the Chinatown Plan Study Area, buildings over 50 ft. tall would not be permitted in that area. The Permanent Controls place these same height and bulk limitations in that area. Therefore, the proposed project could not induce high-rise growth in this area, if the controls are passed by the Board of Supervisors.

The Planning Code Use District Map Figure 14, p. 44 of the EIR, shows that within the Chinatown Plan area there would be three use districts: Chinatown Community Business, Chinatown Residential/Neighborhood Commercial and Chinatown Visitor Retail. The proposed project which is outside the area regulated by the controls, could not change the pattern of uses from those allowable under the permanent controls, which include virtually the same use districts as those under the interim controls shown in Figure 14. The controls may or may not be passed by the Board of Supervisors, or may be passed with revisions.

In any case, as noted on p. 139 of the EIR, "The project would be built in a developed urban area, and no expansion to the municipal infrastructure not already under consideration would be required to accommodate new development and increased employment due to, or induced by the project."

MITIGATION MEASURES

CULTURAL RESOURCES

Comment

"Though the [Native American Heritage] Commission supports the proposed mitigation measures for cultural resources, cited in the . . . document, we request that if any cultural resources are located and determined to be of a sensitive/significant nature that the local Native American community be consulted. Additionally, if human remains are encountered it is mandatory that this office be notified, at which time we will follow the procedures set forth in Section 5097.98 of the Public Resources Code." (R. Paige Talley, NAHC).

Response

The Comment is acknowledged. If any cultural resources are found and determined to be of sensitive or significant nature, the local Native American Community will be consulted. If related human remains are encountered, the Native American Heritage Commission will be notified, at which time it will follow the procedures set forth in Section 5079.98 of the Public Resources Code.

TRANSPORTATION

Comments

"We would, again, request that the project developer, as a transportation mitigation measure, formally waive the right to refuse the attachment of eyebolts to the building so as to accommodate overhead trolley wires pursuant to Public Utilities Resolution #81-0098." (K. L. (Dan) Wong, MUNI)

"p. 144 Why has the project sponsor rejected the MUNI eyebolts?" (Georgia Brittan, SFRG)

Response

As previously noted on p. 230 herein, no MUNI eyebolts are attached to the existing buildings on-site; therefore, no existing eyebolts would require replacement due to the project.

The last paragraph on p. 144 of the EIR, under Mitigation Measure Rejected by Project Sponsor, is revised as follows (new language is underlined):

The project sponsor could, in consultation with the Municipal Railway, install eyebolts or make provisions for direct attachment of eyebolts for MUNI trolley wires on the proposed building, wherever necessary, or agree to waive the right to refuse the attachment of eyebolts to the proposed building if such attachment is done at City expense. The sponsor prefers not to have MUNI eyebolts attached to the proposed building because, in his opinion, they are unattractive and would detract from the aesthetic quality of the building.

Although the project sponsor has rejected this measure, nevertheless, as noted on p. 140, first paragraph last sentence: "Measures under consideration or measures rejected by the sponsor may be required by the City Planning Commission as conditions of project approval."

Comment

"p. 143 Why is this project sponsor going to participate in the feasibility studies for the intercept parking facility if they are seeking a variance to allow long-term parking?" (Georgia Brittan, SFRG)

Response

The two actions are not mutually exclusive. The project would result in an unmet parking demand of 227 equivalent daily spaces as discussed in the second full paragraph on p. 120 of the EIR. The mitigation measure referred to by the commenter is a standard mitigation measure for new C-3 office projects to reduce the parking and transit impacts resulting from such projects.

Please see responses on pp. 244-247 herein, which discuss the issues of long-term parking and a variance for the project.

Comment

"Since the developer is openly willing to subsidize automobile parking by providing a large number of parking spaces on-site, they should also be willing to provide, as a transportation mitigation measure, subsidized transit passes to employees working at the project site. Subsidized transit passes, either leasee or employer subsidized, have been proven in a number of major U.S. cities to reduce the transit modal split, which, in turn, reduces the project's adverse transportation impacts. While we cannot recommend approval of the excess parking, if such approval is granted, subsidized transit passes should be a parallel condition." (K. L. (Dan) Wong, MUNI)

Response

The comment is acknowledged. The Department of the City Planning Developers' Manual for the Implementation of Transportation Conditions, adopted by the City Planning Commission April 3, 1986 (Resolution No. 10659) notes, regarding sale of BART and Muni monthly transit passes on-site, "there seems little reason to regard this as an important measure to promote transit use because the great majority of employees already work in downtown San Francisco and do not need an introduction to available transit sales. Also, there are numerous convenient vendors who already sell the passes."

The manual recommends that employers be informed that they may purchase blocks of tickets to sell to their employees. Coordination of transit pass bulk purchase and distribution to employees can be facilitated through a new MTC program providing one-stop purchase of passes for multiple operators (pp. A-9 and 10).

The manual notes that "with the vast majority of employees familiar with, and likely to use, public transit regardless of the inducement, there is little rationale for subsidized sales unless survey results indicate a need for additional incentives for specific tenants with low transit ridership profiles. However, those employers now

subsidizing employee parking may be willing to subsidize transit use in the interest of equity" (p. A-10).

As mitigation for project impacts on the transit system, the project sponsor would be required to pay about \$1.08 million, the Transit Impact Development fee, to Muni and would implement a Transportation Systems Management program.

The project sponsor has no plans to subsidize the transit passes of office employees. On-site transportation brokerage services are included as a mitigation measure, however, and it could be possible that such a program might include subsidized transit passes. Such a measure would be at the discretion of individual employers who are building tenants.

Comment

"p. 145 Should specifically site [sic] the mitigation measures from Section V.E. of the DTP EIR that are considered 'essential to accommodate planned growth' according to the DTP EIR. Those two [four] are: "Vehicle Plan' 1983-88 Short Range Transit Plan, MUNI; 'Vehicle Plan,' Scenario XIII of Projections of Future MUNI Demand and Vehicle Requirements; 1983-88 Short Range Transit Plan, BART; and the MUNI Metro Turnaround.

"Please give the status of all these programs. Please do not incorporate by reference information on the MUNI Metro Turnaround in the 535 Mission C&R #84.403. Please give an update current at the time the responses are written.

"Additionally, the response in the 535 Mission C&R is unsatisfactory concerning the MUNI Metro Turnaround. That responses says: 'The MUNI Metro Turnaround at the Embarcadero was not assumed to be completed in the transportation impacts analysis in the Downtown Plan EIR. Instead it was considered as potential mitigation of the impacts which were forecast. Therefore, a lack of progress of the turnaround would not increase the impacts described in the Downtown Plan EIR or this project.'

"If this is the case, why does the DTP EIR as certified by the Planning Commission say about the turnaround: 'This project is essential to accommodate peak-period demand due to planned growth. (Page V.E.6a)'." (Georgia Brittan, SFRG)

Response

Mitigation measures from Section V.E. of the Downtown Plan EIR have been incorporated by reference in this tiered EIR. (See p. 106 of the 600 California EIR). In the interests of focusing this EIR on the issues at hand, this EIR does not include repetitive discussion of material from which this EIR has been tiered. (See also response on tiered EIRs on p. 170 of this document).

Regarding Muni's "Vehicle Plan" in the 1983-88 Short Range Transit Plan (Measure 13a of the transportation and Circulation Mitigation Section of the Downtown Plan EIR), below is a table which compares 1991 planned vehicle fleets under this 1983 plan and the current 1986 plan.

1991 PLANNED VEHICLE FLEETS

<u>VEHICLE TYPE</u>	<u>1991 PM Peak - Total Vehicle Requirements</u>	
	<u>FROM 1983 PLAN</u>	<u>FROM 1986 PLAN</u>
<u>Motor Coach</u>		
Standard	240	305
Artic	<u>192</u>	<u>160</u>
TOTAL	432	465
<u>Trolley Coach</u>		
Standard	345	345
Artic	<u>73</u>	<u>30</u>
TOTAL	418	375
LRV	139	130
Streetcar	19	0
Cable Car	<u>31</u>	<u>31</u>
FLEET TOTAL	1,038	1,001

Regarding the status of Measure 13b of the Transportation and Circulation Mitigation section of the Downtown Plan EIR, there has been no update of Scenario XIII in Muni's Projections of Future Muni Demand and Vehicle Requirements. The program remains the same as described in the mitigation measure.

As stated in Measure Two of the Transportation and Circulation Mitigation section of the Downtown Plan EIR, BARTS' 1983-1988 Short Range Transit Plan contained

projects in the BART expansion program. Of these projects, the third (KE) track in downtown Oakland has already been implemented. The other projects are now scheduled to be completed as follows: construction of the Daly City Turnback in December, 1987; purchase of 48 "C" cars in October 1987 and 102 more "C" cars in September 1988, installation of new Automatic Train Control in July 1988; enhancement of Central Train Computer in October 1987; and implementation of Primary Train Detection in July 1989.

The Muni Metro turnaround at The Embarcadero was not assumed to be completed in the transportation impacts analysis in the Downtown Plan EIR. Instead, it was considered as a potential mitigation for transit impacts projected to result from employment growth. Therefore, a lack of progress of the turnaround would not increase the impacts described in the Downtown Plan EIR or this project EIR. The information contained in the response from the 535 Mission St. EIR remains correct. If the turnaround were not completed, impacts would be as described in the impacts section of the Downtown Plan EIR. If it is completed, employment growth could be better handled and impacts on Muni could be somewhat mitigated. As noted in the comment, this mitigation measure is one of those considered essential to reduce impacts of forecast growth. The sentence quoted in the comment is from EIR Section V – the Mitigation Measure chapter. For a more detailed discussion of the Muni Metro Turnaround, and how its construction would affect the transportation impacts forecast in the Downtown Plan EIR, see Downtown Plan EIR, Vol III, Responses to Comments, pp. C&R-E.64-66.

The Muni Metro turnaround is currently in the preliminary engineering phase. Environmental assessment for the Federal Environmental Impact Statement (EIS) is also being conducted, at the same time as the engineering analysis, to allow necessary design adjustments. The preliminary engineering work is behind schedule because of extra analytical tasks (e.g., the China Basin extension) that have been added. However, the results of these analyses may lead to a preferred design alternative that could reduce the time needed for the later phases (final engineering, design and construction). Due to the uncertainty of these results, an exact schedule of the remaining phases of final engineering and construction is not possible at this time.

Subsequent to publication of 535 Mission Comments and Responses, the San Francisco PUC was contacted for an update on the Metro turnaround; thus the latest information follows. A new feasibility study on alternative plans for the Embarcadero alignment will be completed in mid 1987./1/ The present proposed Muni Metro alignment alternative would not necessitate tunneling under Justin Herman Plaza. The Muni Short-Range Transit Plan 1986-1991 projected that the final phase of the Muni Metro turnaround will be completed in March 1990. Currently, completion of the turnaround is scheduled for late 1991. If the design alternative of the Muni Metro turnaround, noted above, is implemented, completion could be sooner.

Funding for the phases beyond the preliminary engineering and EIS work is not as yet in-hand; however, the Muni Metro turnaround is the second highest transit priority in the Bay Area, behind the Daly City BART turnback, according to MTC./2/

NOTE - Transportation

/1/ Mr. Everett Hintze, project manager, Utilities Engineering Bureau of the San Francisco Public Utilities Commission, telephone conversation, August 7, 1986, and January 16, 1987, and Mr. Don Eng, project manager, telephone conversation, March 6, 1987.

/2/ Fiscal Year 87-91 Regional Transit Capital Priorities, approved May 28, 1986 by the Metropolitan Transportation Commission.

UTILITIES

Comment

"p. 149 What is the city's policy on recycling in light of the recent problems with securing land to lease for garbage fill. Please check with programs in place in the CAO's office concerning recycling and include this information in the C&R." (Georgia, Brittan, SFRG)

Response

The City of San Francisco currently has a goal of recycling 35% of its waste by the year 1996./1/ A variety of programs have been established to promote recycling

in private industry, to achieve this objective. There are currently no recycling requirements for San Francisco office tenants. The San Francisco Chief Administrator's Office (CAO) encourages building management to establish recycling programs; however, there is no formal implementation plan. Typically 50% – 70% of office waste is high grade white paper and computer paper. Therefore, the CAO considers participation in the City's Office Paper Recycling Program to be the most cost effective recycling effort for office tenants. Participating firms can reduce their waste disposal cost and receive payment for materials recycled as bonus. The CAO Recycling Coordinator provides a list of recycling collectors/paper dealers. Participation in the program is most feasible when the building design provides a storage area for recyclable waste, preferably near a loading dock. This area should be large enough to hold four large hampers, 3 ft. x 5 ft. x 3 ft. General building design should allow for easy collection of paper from each office to the storage area, and from the storage area to the loading dock./1/

As noted on p. 149 of the EIR, "The project could provide containers to collect and store recyclable solid waste (such as glass, metal, computer cards, and newspaper) and the project sponsor could contract for recycling service. The project sponsor will make a decision about this measure during final building design based on cost effectiveness."

NOTE – Utilities

/1/ May Perlmutter, Recycling Coordinator, and Jane Grossman, Office Paper Recycling Coordinator, Office of the Chief Administrative Officer, telephone conversations, January 15 and 16, 1987.

SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

Comment

"When you look at the significant environmental effects on Page 150, these are very troublesome. It says: 'No project-specific significant impacts have been identified.'

"What you're missing here are two enormous project-specific effects: One on traffic and Muni, and the second on the Chinatown community. I think we are starting to lose those in the shuffle of these EIR's."

"On Page A-31 in the appendix, there is a map of the architectural resources. I would point out it's the architectural resources in the vicinity. And yet, when you come down to describing your cumulative impact, you forget to look in the vicinity again, because the vicinity is a community, and it is Chinatown. You have dropped all findings of impacts on Chinatown, which makes it possible for you to then ignore Chinatown mitigation measures."

"I think your staff needs to go back and look at the checklist. Look at all the things that you talk about in the checklist. Like Page A-11, the checklist on land use. You're supposed to look at the character of the vicinity and the community. The character of that area is small-scale residential, incredibly dense housing, and an incredibly intensive community that has historic roots that go back longer than most of us in this room. It really is an important resource."

"To the extent that we put pressure on Sacramento St., which most of these alternatives do, you are putting strong pressures on Chinatown that are dislocating pressures in the end. The next guy on the next block says: 'Okay. We have a massive building on Sacramento St. for the Federal Home Loan Bank. Why can't I have mine?'"

"Those pressures are very strong in Chinatown and they're visible at this Commission again and again and again."

"I think you need to go back and look seriously at your impacts -- your significant environmental effects. Detail what you need to detail on Chinatown, on traffic, on the displacement of the community, because that gives you the legal handle to deal with the Sacramento St. property in a much more intelligent and detailed manner than is in this EIR. I hope the project is modified at that level."

"I also will be submitting to your staff a copy of a New York Court of Appeals decision that came down on New York's Chinatown where they applied their CEQA -- the New York equivalent of CEQA -- and said that you really need to look at impacts on a community. You're not just looking at flora and fauna, you are looking at loss and impacts on communities."

"I think it's a healthy thing to start looking at." (Sue Hestor, SFRG).

Response

The first sentence of the fourth paragraph in the EIR on p. 150, states that, "Cumulative development in downtown San Francisco would have a significant effect on the environment in that it would generate cumulative traffic increases as well as cumulative passenger loadings on MUNI, BART and other regional transit carriers The proposed project would contribute to these cumulative effects." As stated in the EIR on p. 150, "This chapter is subject to final determination by the City Planning Commission as part of its certification process for the EIR."

Project specific impacts on traffic are discussed on pp. 107–110, p. 116 and pp. 118–123 of the EIR. Project specific impacts on MUNI are discussed on pp. 110–114 of the EIR. Project specific impacts to Chinatown are discussed throughout the EIR. (See Land Use, pp. 74–75, Cultural Resources, pp. 76–77, Urban Design, Table 3, pp. 85–91 and text on p. 92, Shadow and Wind, pp. 93–105, Air Quality, pp. 126–129 and Construction Noise, pp. 129–132.

Discussion of the project in relation to the environmental checklist, in the Initial Study, on pp. A-11 to A-12 also describes land use in the Chinatown area. The EIR discusses land uses in Chinatown on pp. 35–41. Figure 13, p. 42 is a land use map that shows the land uses in the site vicinity, which includes part of Chinatown. Cultural resources in the site area, and early use of the site and area including Chinese commercial enterprises are described on p. 47 of the EIR.

Impacts along Sacramento St. are discussed as part of the environmental analysis in the above-mentioned sections where relevant. In addition, as noted in the Zoning response pp. 205–207 herein, the Chinatown area is currently under Chinatown Permanent Controls, adopted by the City Planning Commission, which regulate the heights and uses in Chinatown, including those along Sacramento St. The permanent controls, if passed into ordinance by the Board of Supervisors, would preclude high-rise development in the area regulated by the controls which includes the area north and west of the site along Sacramento St.

The commenter did not submit a copy of the New York Court of Appeals decision. New York State environmental laws are not a carbon copy of California laws and are not necessarily relevant to interpretation of California laws.

ALTERNATIVES

ALTERNATIVE A: NO PROJECT

Comment

"p. 151 See comment above (p. 133) on no project alternative and FHLB locating in another building." (Georgia Brittan, SFRG)

Response

As noted on p. 258 herein, the decision as to where a business locates is not regulated, and is based on decisions by individual developers, based on a variety of economic and site specific factors. The Bank owns the existing 600 California St. property, and prefers to develop this property which suits its locational needs in order to expand and consolidate all of its San Francisco operations.

ALTERNATIVE E: REDUCED BUILDING HEIGHT ALONG SACRAMENTO ST. WITH A 60-FT. DEEP SETBACK

Comments

"p. 159 With regard to Alternative E, the reasons for rejection are unsatisfactory and need clarification. The preferred alternative [the DEIR project] is bulky when viewed from the north. All you need to do is look at the photomontages to know that. The commenter has no way of comparing how bulky this building would be because: (1) there is no drawing that clearly shows the design of the building in this alternative and (2) there is no photomontage to show how this building will look when viewed from the north, only the words in the EIR.

"Commenter contends that the preferred project shows a major increase in bulkiness in this view corridor and does not understand why this alternative will make all that much difference since the size is not that different.

"The C&R should include information on why this alternative does not meet the project sponsor's space planning needs. Additionally this alternative should have a new design to

meet those space needs using the same characteristics of heights, square footage, FAR, setback. Bulk should not be an issue in this second design because the preferred alternative [the project] is already bulky when viewed from the north.

"If there is any real difference between the alternative and the preferred project the public and decision makers ought to be able to see that difference. If there isn't any real difference (on the California/Kearny Sts. frontages) the alternative should reflect that, with the only difference being the lower height on Sacramento St.

"This issue is particularly important in light of the fact that Alternative E has a Sacramento/Kearny Sts. frontage that is in scale with the existing buildings on Sacramento St. This alternative should also include small retail activity on the Sacramento St. side of the building. Please include it in responding to this comment."
(Georgia Brittan, SFRG)

"Alternative E provides more office footage and FAR, indicating a greater accommodation of Bank's objectives, yet sponsor rejects this alternative. Why?"

"DEIR states that this alternative provides more jobs, more housing funds, more open space, requires more TDR's (protecting more historic or architecturally significant buildings), and offers a lower and more compatible scale on Sacramento St. What are project sponsor's objections to this alternative? Explain sponsor's referenced 'space planning objectives' and how they outweigh each [of the] above-mentioned advantages of this alternatives.

"Show photomontages and more complete renderings of alternative.

"Would Alternative E exceed bulk limits and required volume reductions?" (Gordon Chin, Chinatown Resource Center)

"If you read through the EIR, you will note that the preferred alternative [the DEIR project] has a height of 138 feet along Sacramento St. for two-thirds of the way, and then 45 feet for the most western portion. Alternative E has a height of 50 feet along Sacramento St. We have asked the architects to go back and see if there is a way to refine Alternative E so that it will meet the bank's space-planning objectives and possibly become the preferred alternative." (Sue Diamond, Brobeck, Phleger, and Harrison)

"Our agency also participated in meetings with the bank. We are happy to hear that they are considering redesign." (Lorraine Lowe, Chinatown Coalition for Better Housing)

"First of all, I'd like to say that the committee is very grateful that the Federal Home Loan Bank took the initiative to make sure they did not shadow Portsmouth Square. It certainly did save us a lot of pain, and I'm sure they know it saved them a lot of pain, also." (Jennie Lew, Committee for Better Parks and Recreation in Chinatown)

"I am very delighted to hear the Federal Home Loan Bank has tried to work out a plan so that the community can accept it. But since they do have a study out, I have to go on the record.

"So I am very grateful that, at least, we are beginning to work on it instead of coming in locking horns. I commend them for their efforts. I wish we had done this six months ago. I am sure, with the prestigious architectural firm they have retained, that they can meet the challenge." (Rose Pak, Chamber of Commerce)

"I, too -- as is Ms. Pak -- am pleased to hear that the Home Loan Bank Board is seriously considering a redesign, and one that is, perhaps, more sensitive to the scale of Chinatown." (Gordon Chin, Chinatown Resource Center)

"Again, we have been participating with the Chinatown groups with the Federal Home Loan Bank. We are glad for the change of attitude which I think is very hopeful in terms of a much-reduced-scale building on Sacramento St." (Sue Hestor, SFRG)

"This 'new' Alternative E as outlined above and Alternative F should be combined into one Alternative G." (Georgia Brittan, SFRG)

"We are particularly concerned that the building as designed does not meet the scale and texture of the prevailing context along Sacramento St. The proposed 138 feet height of this portion of the building, coupled with the use of a monumental base and cap, disrupts the continuity and the Chinatown character of Sacramento St. We feel that a 50 feet high

portion, configured so as to read more like an infill building on Sacramento St., with a 60 feet setback reflective of surrounding structures, would be a more appropriate gesture towards Chinatown. We do not feel that any of the proposed EIR Alternatives currently achieve this goal, but we feel this could be accomplished in a manner that would not reduce the overall floor area or change the design approach on California St." (Maurice Lim Miller and R. Thomas Jones, Asian Neighborhood Design)

Response

Alternative E, Building Height of 50-ft. at Sacramento St. with a 60-ft. Deep Setback Above, has been revised to include two subalternatives. The title of Alternative E, on pp. 16 (Summary) and 158, is revised as follows (revised material is underlined):

ALTERNATIVE E: REDUCED BUILDING HEIGHT ALONG SACRAMENTO ST.
WITH A 60-FT. DEEP SETBACK ABOVE

The following is added to pp. 16 (Summary) and 158, directly beneath the revised heading for Alternative E:

ALTERNATIVE E1: BUILDING HEIGHT OF 50-FT. AT SACRAMENTO ST.
WITH A 60-FT. DEEP SETBACK ABOVE

This Alternative is summarized on pp. 16-17 and described on pp. 158-159 of the EIR. The distinctive environmental effects of this alternative are discussed on pp. 159-161 of the EIR. The difference in mid- and long-range views of this alternative compared to the proposed project is described in the third paragraph on p. 159 where it states: "It [Alternative E1] would be less prominent than the project in mid- and long-range views from the north and northwest, and would be of similar prominence in views from other viewpoints."

Page 159, fourth paragraph of the EIR states: "Shadow effects [of Alternative E1] would be similar to the proposed project at most times of the year Wind effects of this alternative would be greater at eight locations tested, the same at six locations and less at eight locations than the project." (See p. A-47 of the EIR.) The last paragraph on p. 159,

states, "The open space requirement would be met as with the project." This paragraph (pp. 159-161 of the EIR) goes on to discuss the Planning Code Art requirements, anticipated employment, and OAHPP requirements in comparison to the proposed project.

Page 161, second paragraph of the EIR states, "Transportation, air quality, energy, and noise effects associated with on-site uses would be about the same as for the project. Cultural resource effects associated with the construction of this alternative would be as for the project." Differences between the proposed project and this alternative are also shown in Table 12, p. 164. As noted in Table 12, this alternative would require bulk exceptions as would the project.

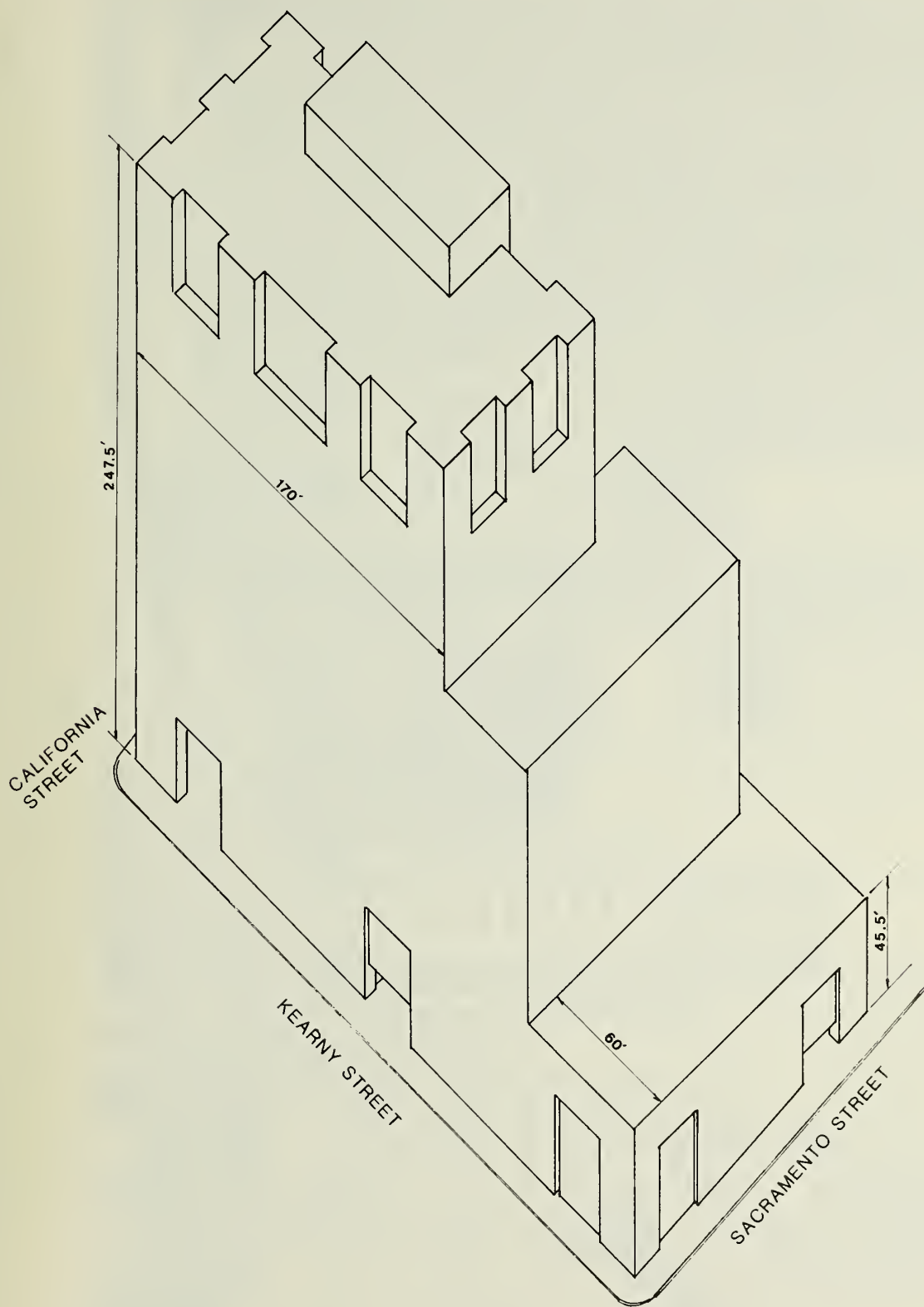
Alternative E2, presented in this document and under consideration by the project sponsor, would also have reduced height along Sacramento St. and would meet the sponsor's space planning objectives. The EIR describes the project as proposed, and alternatives, and identifies their impacts. It is not the purpose of the EIR to justify the intent or objectives served by the proposed project or alternatives.

Figure 31A, p. 290 herein, shows a schematic drawing of Alternative E2. Figure 31B, p. 291 herein, is a photomontage of Alternative E2.

The following is added to pp. 17 of the EIR Summary and 161, following discussion of Alternative E1 and preceding discussion of Alternative F (the Table of Contents is revised to reflect the addition of this alternative):

**ALTERNATIVE E2: BUILDING HEIGHT OF 50-FT. ALONG SACRAMENTO ST.
(RANGING FROM ABOUT 47-60 FEET) WITH A 60-FT. SETBACK ABOVE AND
ALTERNATIVE PARKING SCHEME**

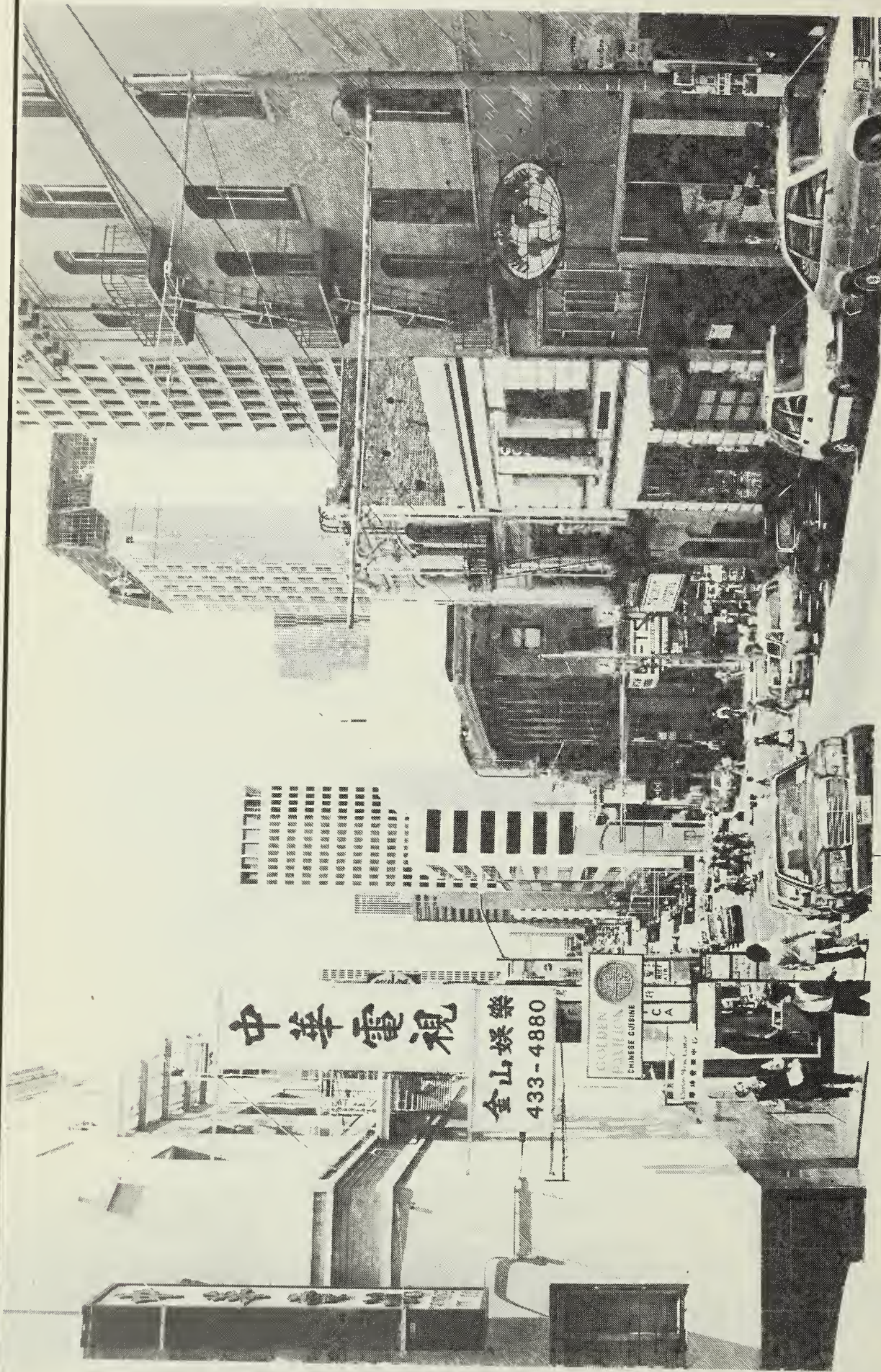
This alternative would be of similar design to Alternative E1 discussed on pp. 158 to 161 of the EIR except that it would step up in three steps instead of two from Sacramento to California on the Kearny St. frontage. This alternative would range from about 47-ft. at the west property line to about 60-ft.-tall at Sacramento and Kearny Sts. with a 60-ft. setback above. The building would step up from 50 ft. to about 146-ft.-tall, along the Kearny St. frontage about 60-ft. south of Sacramento St., then step up again to about 240-ft.-tall about 150 ft. south of Sacramento St. (See Figures 31A and 31B, pp. 161a and 161b [pp. 290-291 herein]). The 240-ft.-tall portion would not be



600 California Street
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FIGURE 31A – ALTERNATIVE E2: BUILDING HEIGHT OF 50 FT. ALONG SACRAMENTO STREET (RANGING FROM ABOUT 47-60 FT.) WITH A 60-FT. DEEP SETBACK ABOVE AND ALTERNATIVE PARKING SCHEME

SOURCE: Kohn Pedersen Fox Associates



SITE

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Square One Film + Video

FIGURE 31B
PHOTOMONTAGE OF ALTERNATIVE E2
FROM SACRAMENTO/WAVERLY INTERSECTION

designed with three vertical components as with Alternative E1. The entire Sacramento St. frontage would range from about 47-ft. to about 60-ft.-tall, and thus be more similar to the existing street wall height along Sacramento St. west and north of the site than the project. This alternative would include about 313,100 sq. ft. office, up to 10,000 sq. ft. retail, 130,600 sq. ft. of parking, loading, mechanical, storage, etc., (compared to 312,700 sq. ft. office, 7,900 sq. ft. retail, and 131,600 sq. ft. of parking, loading, mechanical and storage for the project). The open space requirement of 7,537 sq. ft. (compared to 8,020 sq. ft. for the project) would be met partially on-site in a ground floor galleria along California St. and off-site through the development of new open space at St. Mary's Square (similar to Option B in Alternative F, but not including air rights from the International building). The building would contain about 400 sq. ft. more office space than the proposed project. The total number of parking spaces would be the same as with the proposed project (232 spaces). Of these, 50 would be proposed long-term, 48 proposed replacement short-term, 15 short-term spaces proposed to meet the demand generated by the building, with an additional 119 proposed short-term spaces, all subject to consideration and approval by the City Planning Commission. The parking and loading access and egress for this alternative would differ from the proposed project and Alternative E1. Under Alternative E2 all cars would enter on Sacramento and exit on Kearny, all trucks would enter and exit on Kearny (compared to all cars entering on Sacramento and exiting on Kearny, and all trucks entering and exiting on Sacramento with the project). A truck turntable would not be provided unless required by the Planning Commission as a condition of approval to eliminate potential truck back-ups onto Kearny St.

The FAR of this alternative would be about the same (11:1) as with the project. This alternative would require about 64,256 sq. ft. of TDR (compared to 65,700 sq. ft. for the project). This alternative would have greater maximum diagonal lengths in the upper tower and would require an exception from the City Planning Code separation of towers and bulk limits for the upper and lower towers as with the project. Other features such as building materials and facade ornamentation of this alternative would be as for the project.

DISTINCTIVE ENVIRONMENTAL EFFECTS OF ALTERNATIVE [This heading is not added in Summary revisions]

This alternative would be about 88-ft. shorter than the project at Sacramento and Kearny Sts. (for 60 ft. south of Sacramento St.) and about the same height as the project for the southern portion of the building (about two-feet shorter). This alternative would include three steps in the building, as opposed to two with the project (see Figures 31A and 31B, pp. 161a-161b). It would be less prominent than the project in mid- and long-range views from the north, northeast and northwest, and would be of similar prominence from other viewpoints. This alternative would be more similar to the existing streetwall height, north and west along Sacramento St. in Chinatown, compared to the project which would be more than three times the height of the existing streetwall along Sacramento St.

Shadow effects would be similar to those of the proposed project at most times of the year due to the similar height of this alternative (242 ft.) on the southern portion of the building. In most instances, shadow would be less with this alternative than with the project with the following exceptions: At noon in

December additional shadow would be added in the intersection of Clay and Kearny Sts. In March at noon and in September (one hour later) shadow would increase along Kearny at the northwest corner of Kearny and Sacramento Sts. affecting about 40 ft. of sidewalk length and 15 ft. of crosswalk. June 21 at 3 pm, shadow would increase along a length of approximately 20 ft of sidewalk on the east side of Kearny just south of Sacramento St./1/ A shadow analysis for this alternative is on file and available for review at the Department of City Planning, Office of Environmental Review, 450 Mc Allister St.

During the process of preparing a report evaluating the shadow effects of this alternative in relation to Proposition K, the Park Shadow Ban Ordinance, it was determined that shadow from the alternative could potentially reach the Chinese Playground and shade a narrow strip at its southwestern edge/corner. The effect would occur for about one minute on about five days starting about March 31, at about one hour after sunrise (7 am in March, 7:50 am in September) and for a similar time starting September 11. The project sponsor has stated that the facade of the building would be modified, if necessary, to eliminate this effect./2/ The change, if needed, would involve a slight alteration to the facade of the northeast corner of the southernmost tower (roughly two and one-half ft. by 12 ft. wide and 30 ft. vertically). This change would not be noticable at the scale of the drawings and photomontage prepared for this alternative./3/

Wind effects of this alternative would be about the same as for Alternative E1. Compared to existing conditions, Alternative E2 winds would be greater at nine of the locations tested, the same at six locations and decreased at seven locations. The required 7,537 gsf of open space for this Alternative would be met partially on-site in a galleria along California St. and partially off-site at St. Mary's Square. (similar to Option B of Alternative F, but not including air rights from the International building). This alternative would meet the Planning Code requirement for art, as would the proposed project. This alternative would provide employment for about 1,227 employees, compared to about 1,220 employees for the proposed project. It would generate a demand for about 84 new dwelling units in San Francisco, based on the OAHPP formula, the same as with the project.

Under this alternative all cars would enter from Sacramento St. and exit onto Kearny St. and trucks would enter and exit on Kearny St. This alternative would alter local circulation in comparison to the project as a result of the change to truck loading access. Traffic would decrease slightly from that expected for the project, at the intersection of Sacramento and Grant Sts., as not all trucks would have to pass through that intersection after leaving the building. Traffic would be about the same at the intersection of Sacramento and Kearny Sts. as for the project. With the one-way flows of Kearny and Sacramento Sts. cars would have to pass through the Sacramento and Kearny intersection on entering and on exiting (the same as for the project). Trucks would only pass through the Sacramento/Kearny intersection on exiting the building. Trucks would enter the loading area from Kearny St. and there

would be no turntable. Trucks would need to back into the loading area, which could cause temporary back-ups and delays to traffic on Kearny St. which includes the 9X San Bruno Express and 15 Third Muni lines and Sam Trans Lines. A truck turntable would enable trucks to turn around on-site. Problems would not be expected with backing out onto Kearny except on days when the turntable broke down, which could result in temporary traffic delays on Kearny St. Peak loading activity occurs between 10 a.m. and 2 p.m./4/ Therefore, peak loading activity of trucks on Kearny St. associated with this alternative, would not be expected to coincide with peak period traffic on Kearny St. which occurs during the pm commute period. Also, Muni lines run on the opposite side of Kearny St. from the site. A truck turntable could be required by the Planning Commission as a condition of project approval.

The project would not change levels of service at nearby intersections or freeway on-ramps, and this alternative would have still less impact.

Additionally, under this alternative the curb-cut would be 40 ft. wide, exceeding the allowable 30-ft. curb-cut in City Planning Code, Section 155(d). Thus, this alternative would need an exception to the Standard Requirements for Automobile Driveways (Order No. 62850) from the Director of Public Works.

Air quality, energy, and noise effects associated with on-site uses would be about the same as with the project. Cultural resource effects associated with construction of this alternative would be as for the project.

SPONSOR'S REASONS FOR CONSIDERATION [This heading is not added in Summary revisions]

The sponsor is considering this alternative as it would meet the space needs of the Bank, and respond to concerns raised about the project.

NOTES – Alternative E2

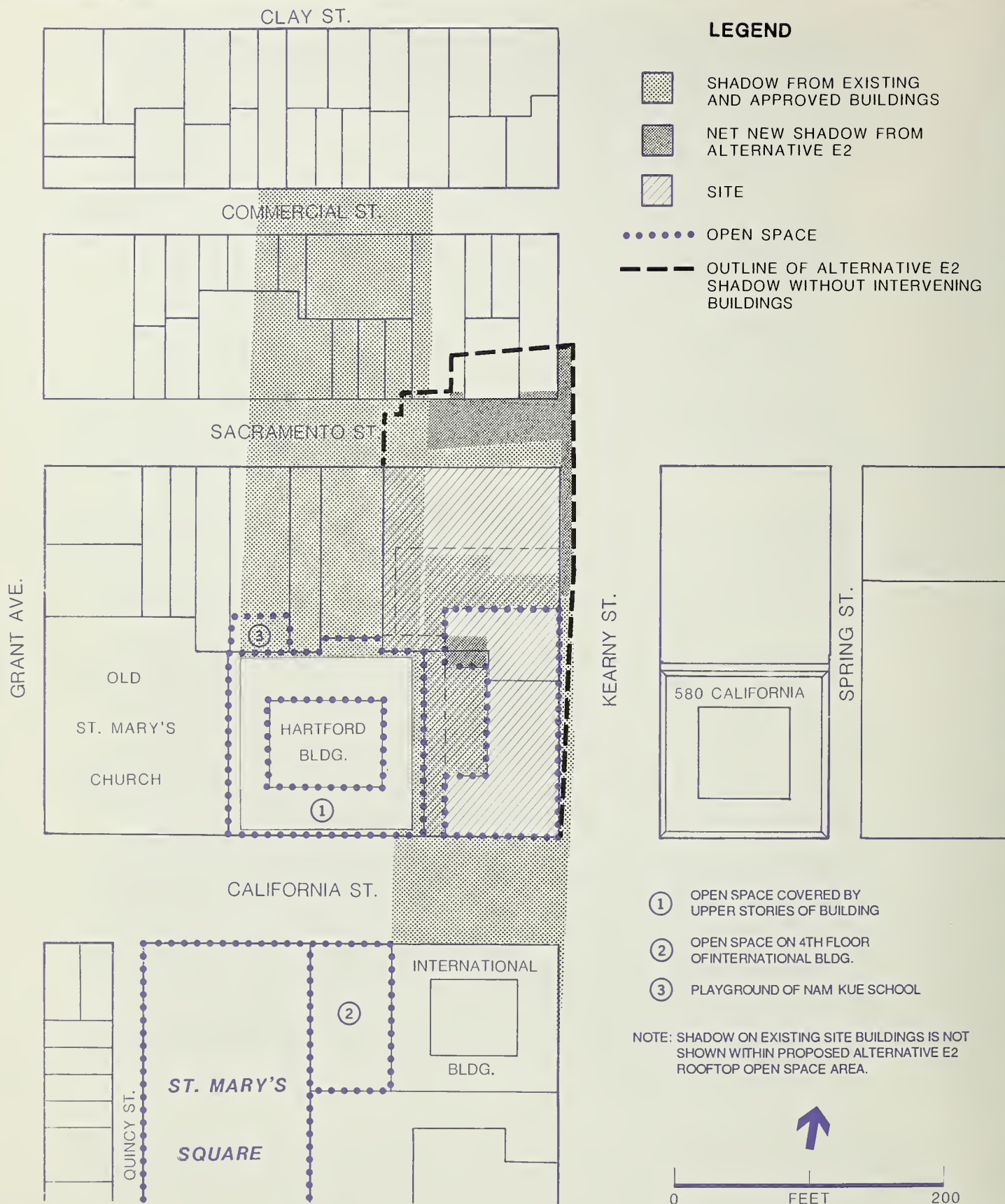
/1/ Memorandum from Charles Bennett, Vice President ESA, March 5, 1987. A copy of this memorandum is on file and available for review at the Department of City Planning, Office of Environmental Review, 450 Mc Allister St.

/2/ Raymond E. Terwilliger, Jr., Federal Home loan Bank of San Francisco, letter dated February 25, 1987. This letter is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.

/3/ The Proposition K analysis is on file and available for public review at the Department of City Planning, 450 McAllister St., Fourth Floor.

/4/ San Francisco Department of City Planning, 1980, Center City Circulation and Goods Movement Study.

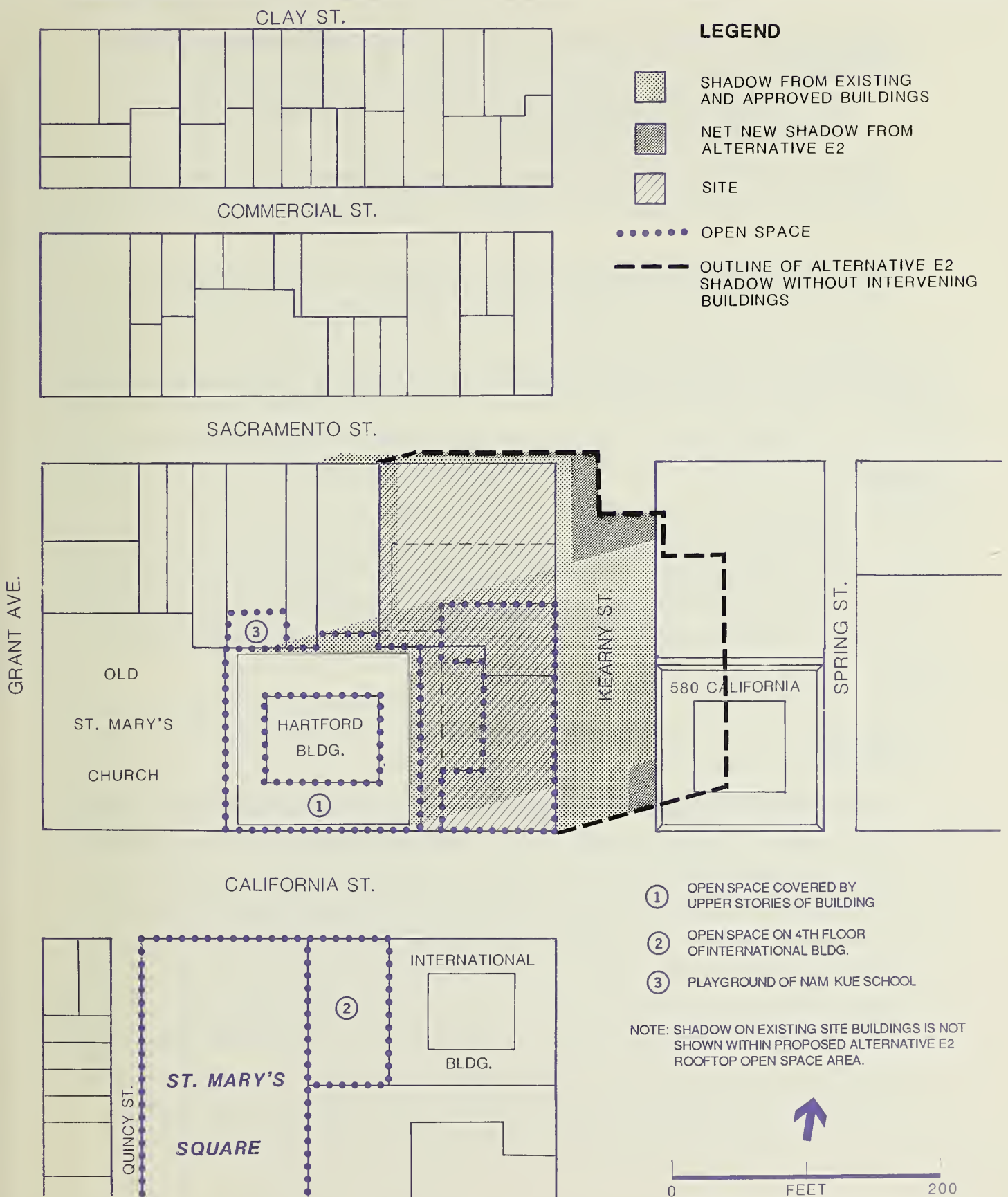
Figure C&R 2, Alternative E2, Shadow Pattern, March 21 at noon, and Figure C&R 3, Alternative E2, Shadow Pattern, June 21, at 3 p.m., indicate the two times a year, discussed above when shadow would be added by this alternative.



600 California Street
Federal Home Loan Bank of San Francisco

FIGURE C&R 2
ALTERNATIVE D E2, SHADOW PATTERN,
MARCH 21, NOON

SOURCE: ESA



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE C&R 3
ALTERNATIVE E2, SHADOW PATTERN,
JUNE 21, 3 P.M.

The last sentence of the first paragraph on p. 151 is changed to read (new text is underlined):

See Table 12, p. 164 for a summary comparison of the project with Alternatives B, C, D, E1, E2 and F.

Table 12, p. 164 of the EIR, is revised to add Alternative E2; the Title of Alternative E is changed to be Alternative E1. Table 12, is reproduced here on p. 299.

(The Table of Contents is revised to reflect the addition of this alternative).

ALTERNATIVE F: PROVISION OF REQUIRED OPEN SPACE OFF-SITE, AT ST. MARY'S SQUARE

Comment

"p. 161 Alternative F should include information on sunlight and wind on the expanded St. Mary's Square. Please explain the role of the International Building in granting air rights and give a sense of the overall cost of providing both Option A and Option B. It should also include a time frame for when completion would be feasible." (Georgia Brittan, SFRG)

Response

Neither the 600 California St. DEIR project nor Alternative F would shade St. Mary's Square. Once this was determined, further analysis of shadows at St. Mary's Square was not prepared as part of this EIR. Winds at St. Mary's Square under existing conditions and for the project and alternatives, are shown in Appendix A, pp. A-46 and A-47, Figure B-1. Wind speeds under existing conditions, exceed the seating criteria, at both locations tested in the park. The DEIR project would reduce wind speeds at both locations; however, the seating criteria would continue to be exceeded at both locations. With Alternative E, winds would remain the same as with existing conditions at both locations and would continue to exceed the 7 mph criterion. Wind speeds at the area proposed for expansion of St. Mary's Square were not tested as part of the analysis for this project. All other environmental effects of this

alternative would be similar to the DEIR project and Alternative E, as the building envelope would be the same; the only difference would be that the open space would be off-site rather than on the building rooftop. The expanded open space at St. Mary's Square could be designed to include trees or berms to reduce wind speeds to meet the seating comfort criteria; such a measure could be a condition of project approval.

The International Building overhangs part of the proposed open space areas adjacent to the existing St Mary's Square park, shown in Figure 32, p. 162 of the EIR. The project sponsor would have to purchase air-rights from the International Building, if the expansion were to extend into this area. Specific costs of options A and B have not yet been determined. This alternative would require coordination and/or approvals from various City agencies and/or legislative bodies including the Department of Real Estate, the Recreational and Park Department and Commission, the Art Commission and the Board of Supervisors. If this alternative open space were to prove infeasible, the developer would provide the open space requirement as proposed with the DEIR project, or by other means as provided for under the Downtown Plan/City Planning Code, such as, for example, participation in implementation of the Pedestrian Network Plan of the Downtown Plan.

Alternative E2, under consideration by the project sponsor, would include some open space on the ground floor of the building, as well as the remainder of the open space requirement satisfied by the sponsor contributing funds to the expansion of St. Mary's Square (similar to Option B, of Alternative F, except without the purchase of air rights from the International Building).

Either Option A or B, would be implemented so as to be open for public use upon completion of the proposed 600 California St. project.

TABLE 12 REVISED: SUMMARY COMPARISON OF PROJECT WITH ALTERNATIVES B, C, D E1, E2 AND F

	<u>Project</u>	<u>Alt. B</u>	<u>Alt. C</u>	<u>Alt. D</u>	<u>Alt. E1</u>	<u>Alt. E2</u>	<u>Alt. F</u>
FAR	11:1	9:1	10:1	12:1	12:1	11:1	11:1
Height to top of Penthouse (ft.)	266	154	266	301	266	260	260
<u>Use Areas</u>							
Office (sq. ft.)	312,700	223,500	312,700	317,500	319,800	313,100	312,700
Retail (sq. ft.)	7,900	7,900	7,900	7,900	7,900	10,000	7,900
Parking, Loading, Mechanical, Storage etc. (sq. ft.)	131,700	130,700	41,100	131,700	131,700	130,900	131,700
Total Gross sq. ft.	452,300	362,100	361,700	457,100	459,400	454,000	452,300
Maximum Number of Floors	18	10	18	21	18	19	18
Required Open Space (sf)	8,020	6,236	7,234	8,116	8,162	7,537	8,020
Open Space Provided							
On-Site:	10,400	8,800	10,400	10,700	10,700	/a/	None
Off-Site:	0	0	0	0	0	/a/	(A)8,800 sq. ft. (B)30,350 sq. ft.
<u>Relationship to Downtown Bulk Requirements</u>							
Needs Bulk Exception	Yes	Yes	Yes	No	Yes	Yes	Yes
Needs Separation of Towers Exception	Yes	No	Yes	No	Yes	Yes	Yes
<u>Other Features</u>							
Child Care	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Art	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Need TDRs (sq. ft.)	65,700	0	26,300	70,200	72,360	64,256	65,700
Shadows on St. Mary's Sq.	No	No	No	No	No	No	No
Portsmouth Square	No	No	No	Yes	No	No	No
Chinese Playground	No	No	No	Yes	No	No	No
Housing Units							
Requires (OAHP)	84	49	83	85	86	84	83
Potential Jobs	1,220	882	1,216	1,239	1,240	1,227	1,220

/a/ Some open space would be included on-site, in the galleria along California St., the majority of the requirement would be met off-site at St. Mary's Square.

SOURCE: Environmental Science Associates, Inc. and Kohn Pedersen Fox Associates

D. STAFF INITIATED TEXT CHANGES AND ERRATA

Page 3, third paragraph, fifth line which reads ". . . of the seven percent proposed for replacement" is corrected to read:

". . . of the space proposed for replacement" (delete seven percent)

Page 7, last paragraph, fourth sentence is changed to read, ". . . winds would increase to 15 mph, such that this criterion . . ." (new language underlined).

Page 115, last line, last paragraph, is changed to read, ". . . because there would be 37 fewer parking spaces . . ." (new language underlined).

Page 130, last paragraph, second sentence is revised as follows (new language is underlined):

During excavation and exterior finishing noise levels inside the school and in these residential units could reach 66 dBA with windows open and 61 dBA with windows closed; exterior noise levels would be about 76 dBA.

The title on p. 150 of the EIR which reads "VI. SIGNIFICANT ENVIRONMENTAL EFFECTS" is revised to read:

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED.

The legend on Figure 14, p. 44, of the Planning Code Height and Bulk Districts is changed to read, "Numbers Indicate Maximum Height. In 'S' Bulk Districts, Height May Be Increased By Up To 10%. Letters Indicate Height Above Which Bulk Maximums Apply. For example:" (new language underlined).

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Attn: Rolf Wheeler

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Attn: Susan Pearlstine

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San Francisco, CA 94111
Attn: David Jones

San Francisco Building and
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San Francisco, CA 94110
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San Francisco, CA 94104
Attn: Richard Morten

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San Francisco, CA 94114

Paul Wartelle
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San Francisco, CA 94110

Steven Weicker
899 Pine Street, #1610
San Francisco, CA 94108

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Council of Community Housing
Organizations
409 Clayton Street
San Francisco, CA 94117

Howard Wexler
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Eunice Willette
1323 Gilman Avenue
San Francisco, CA 94124

Bethea Wilson & Associates
Art in Architecture
2028 Scott, Suite 204
San Francisco, CA 94115

Wu Yee Childcare
777 Stockton Street
San Francisco, CA 94108
Attn: Norman Yee

Alan Yee
3270 East 14th Street
Oakland, CA 94601

Yong Wo Association
746 Sacramento Street
San Francisco, CA 94108
Attn: Byron Mok

Marie Zeller
Whisler-Patri
P.O. Box 7054
San Francisco, CA 94120-7054

ADJACENT PROPERTY OWNERS

241/25
650 California Street Association
c/o Hogland Bogard & Bertero Mgt.
650 California Street, #1800
San Francisco, CA 94108

240/16
Sacramento-Kearny Co.
350 Sansome Street
San Francisco, CA 94114

240/7
580 California Venture
c/o Gerald D. Hines Interests
2800 Post Oak Blvd.
Houston, TX 77056

258/32
State of California Public Employees
Retirement System

258/3
City of San Francisco

226/12
Wong Guon Kay 1/5
Tuck King & Tun Foon Wong
732 Sacramento Street
San Francisco, CA 94108

226/11
Chinese Chamber of Commerce of S.F.
c/o S. L. Lam
730 Sacramento Street
San Francisco, CA 94108

226/10
KHC Investment Co.
445 Grant Ave., #700
San Francisco, CA 94108

226/9
Ching Wong Min & Wong Man
Foon Wong Lok
710 Sacramento Street, #4
San Francisco, CA 94108

226/8
ASCO Investment Co. of Sacramento
c/o John Fung
625 Kearny Street
San Francisco, CA 94108

22/20
Wong Chung Kwong & Mai Lai
441 Dewey Blvd.
San Francisco, CA 94116

MEDIA

Associated Press
1390 Market Street, Suite 318
San Francisco, CA 94102
Attn: Bill Shiffman

Leland S. Meyerzove
KPOO - FM
P.O. Box 6149
San Francisco, CA 94101

San Francisco Bay Guardian
2700 - Nineteenth Street
San Francisco, CA 94110
Attn: Patrick Douglas, City Editor

San Francisco Business Journal
635 Sacramento Street, Suite 310
San Francisco, CA 94111
Attn: Kirstin E. Downey

San Francisco Chronicle
925 Mission Street
San Francisco, CA 94103
Attn: Evelyn Hsu

San Francisco Examiner
P.O. Box 7260
San Francisco, CA 94120
Attn: Gerald Adams

San Francisco Progress
851 Howard Street
San Francisco, CA 94103
Attn: E. Cahill Maloney

The Sun Reporter
1366 Turk Street
San Francisco, CA 94115

Tenderloin Times
146 Leavenworth Street
San Francisco, CA 94102
Attn: Rob Waters

LIBRARIES

Cogswell College Library
600 Stockton Street
San Francisco, CA 94108

Document Library
City Library - Civic Center
San Francisco, CA 94102
Attn: Faith Van Liere

Environmental Protection Agency Library
215 Fremont Street
San Francisco, Ca 94105
Attn: Jean Circiello

Stanford University Libraries
Jonsson Library of Government Documents
State and Local Documents Division
Stanford, CA 94305

Government Publications Department
San Francisco State University
1630 Holloway Avenue
San Francisco, CA 94132

Hastings College of the Law - Library
200 McAllister Street
San Francisco, CA 94102-4978

Institute of Government Studies
1209 Moses Hall
University of California
Berkeley, CA 94720

PROJECT SPONSOR

Federal Home Loan Bank of San Francisco
600 California St.
San Francisco, CA 94120
Attn: Raymond Terwilliger, Jr.

PROJECT ARCHITECT

Kohn Pedesen Fox Associates PC
111 West 57th Street
New York, NY 10019
Attn: Lee Polisano

PROJECT ATTORNEY

Brobeck Phleger & Harrison
Spear St. Tower
One Market Plaza
San Francisco, CA 94105
Attn: Susan Diamond

● XI. CERTIFICATION MOTION

File No.:86.85F
Address:600 California Office Building:
600 California and 551 Kearny Street
West side of Kearny Street from
California to Sacramento Street
Lots 3 & 26 in Assessor's Block 241

SAN FRANCISCO

CITY PLANNING COMMISSION

MOTION NO. 10955

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED OFFICE/RETAIL MIXED USE DEVELOPMENT LOCATED AT 600 CALIFORNIA STREET, THE WEST SIDE OF KEARNY STREET FROM CALIFORNIA TO SACRAMENTO STREET.

MOVED, That the San Francisco City Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as case file No. 86.85E: 600 California Street (hereinafter "Project") based upon the following findings:

1) The City and County of San Francisco, acting through the Department of City Planning (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et. seq., (hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

a. The Department determined that an EIR was required and provided public notice of that determination by publication in a newspaper of general circulation on July 11, 1986.

b. On November 14, 1986, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the City Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.

c. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by Department staff on or about, November 17, 1986.

d. On November 14, 1986, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies.

e. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on November 14, 1986.

2) The Commission held a duly advertised public hearing on said Draft Environmental Impact Report on December 18, 1986, at which opportunity was given for, and public comment was received on, the DEIR. The period for written comments ended December 29, 1986.

3) The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 45-day public review

CITY PLANNING COMMISSION

File No.:86.85E

Address :600 California Office Building:
600 California and 551 Kearny Street
West side of Kearny Street from
California to Sacramento Street
Lots 3 & 26 in Assessor's Block 241

Motion No. 10955

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period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a "Draft Summary of Comments and Responses," published on March 9, 1987, was distributed to the Commission and to all parties who commented on the DEIR, and was available to others upon request at Department offices.

4) A Final Environmental Impact Report has been prepared by the Department, based upon the DEIR, any consultations and comments received during the review process, any additional information that became available, and the Summary of Comments and Responses all as required by law.

5) Project Environmental Impact Report files have been made available for review by the Commission and the public, and these files are part of the record before the Commission.

6) On March 19, 1987, the Commission reviewed the Final Environmental Impact Report and found that the contents of said report and the procedures through which the Final Environmental Impact Report was prepared, publicized and reviewed comply with the provisions of CEQA, the CEQA Guidelines and Chapter 31.

7) The project sponsor has indicated that the presently preferred alternative is that described in the Environmental Impact Report as Alternative E2.

8) The City Planning Commission hereby does find that the Final Environmental Impact Report concerning 86.85E: 600 California Street is adequate, accurate and objective, and that the Summary of Comments and Responses contains no significant revisions to the Draft Environmental Impact Report in compliance with CEQA and the CEQA Guidelines.

9) The Commission, in certifying the completion of said Final Environmental Impact Report, hereby does find that the project described in the Environmental Impact Report, and the project sponsor's presently preferred alternative described as Alternative E2 in the Environmental Impact Report:

a. Will have no project-specific significant effects on the environment;

b. Will have a significant effect on the environment in that either would contribute to cumulative downtown traffic increases and cumulative passenger loadings on Muni, BART, and other transit carriers. Such cumulative transportation impacts could cause violations to total suspended particulate (TSP) standards in San Francisco with concomitant health effects and reduced visibility.

CITY PLANNING COMMISSION

File No.:86.85E

Address :600 California Office Building:
600 California and 551 Kearny Street
West side of Kearny Street from
California to Sacramento Street
Lots 3 & 26 in Assessor's Block 241

Motion No. 10955

Page Three

I hereby certify that the foregoing Motion was ADOPTED by the City Planning Commission at its regular meeting of March 19, 1987.

Lori Yamauchi
Secretary

AYES: Commissioners Allen, Hemphill, Karasick, Nakashima, Rosenblatt, Wright

NOES: Commissioner Bierman

ABSENT: None

ADOPTED: March 19, 1987

XII. APPENDICES

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DEPARTMENT OF CITY PLANNING 450 McALLISTER STREET • SAN FRANCISCO CALIFORNIA 94102

NOTICE THAT AN ENVIRONMENTAL IMPACT REPORT IS DETERMINED TO BE REQUIRED

Date of this Notice: July 11, 1986

Lead Agency: City and County of San Francisco, Department of City Planning
450 McAllister Street, San Francisco, CA 94102

Agency Contact Person: Carol Roos

Telephone: (415) 558-5261

Project Title: 86.85E:
600 California Street,
Federal Home Loan Bank
of San Francisco

Project Sponsor: Federal Home Loan Bank of
San Francisco

Project Contact Person: Raymond Terwilliger, Jr.

Project Address: 600 California St., the west side of Kearny St. from Sacramento to
California Sts.
Assessor's Block(s) and Lot(s): Lots 3 and 26, in Assessor's Block 241

City and County: San Francisco

Project Description: Demolition of a nine-story office building and a three-story parking garage. Construction of an office and retail building stepped from about 138 feet-tall, nine stories (at Sacramento St.) to about 244 feet-tall, 18 stories (at California St.), plus subsurface parking. The project would contain about 328,000 gross square feet (gsf.) of office, 15,600 gsf. of retail, 7,500 gsf. of open space, 230 parking spaces, up to five service and loading spaces.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Please see attached Initial Study

Deadline for Filing of an Appeal of this Determination to the City Planning Commission: July 21, 1986.

An appeal requires: 1) a letter specifying the grounds for the appeal, and;
2) a \$35.00 filing fee.

Barbara W. Sahm
Barbara W. Sahm, Environmental Review Officer

Initial Study
600 California Street
Federal Home Loan Bank of San Francisco
86.85E

I. PROJECT DESCRIPTION

The proposed project would be the demolition of a nine-story office building and a three-story parking garage and construction of an office and retail building, plus subsurface parking. The site is bounded by California, Kearny and Sacramento Streets and by development on the west (see Figure 1, p. 2); the main building entrance and address would be on California Street. The new building would include three levels of subsurface parking with mechanical space; ground floor retail, open space and service space; 17 floors of office space and a mechanical penthouse. The project would contain about 328,000 gsf of office, 15,600 gsf of retail, and 7,500 gsf of public open space, and about 230 parking spaces on two to three subsurface levels. The proposed building would step down from about 244 ft., 18 stories, at the corner of California and Kearny Streets to about 138 ft., nine stories, at the corner of Kearny and Sacramento Streets (see Figure 2, p. 3). The mechanical level would extend another 15 ft., for a total height of 259 ft. at California and Kearny; there would be no mechanical level extending above the lower portion of the building along Kearny and Sacramento Streets. Up to three service vehicle and two van service loading spaces would be provided. Service loading and parking access would be from Sacramento Street. The Floor Area Ratio (FAR) on the project site would be 12:1. The project proposes the use of about 87,300 gsf of Transferable Development Rights (TDRs) from as-yet unidentified lots.

The project sponsor is the Federal Home Loan Bank of San Francisco. The project architect is Kohn Pederson Fox Associates. Project plans are on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister Street, San Francisco.

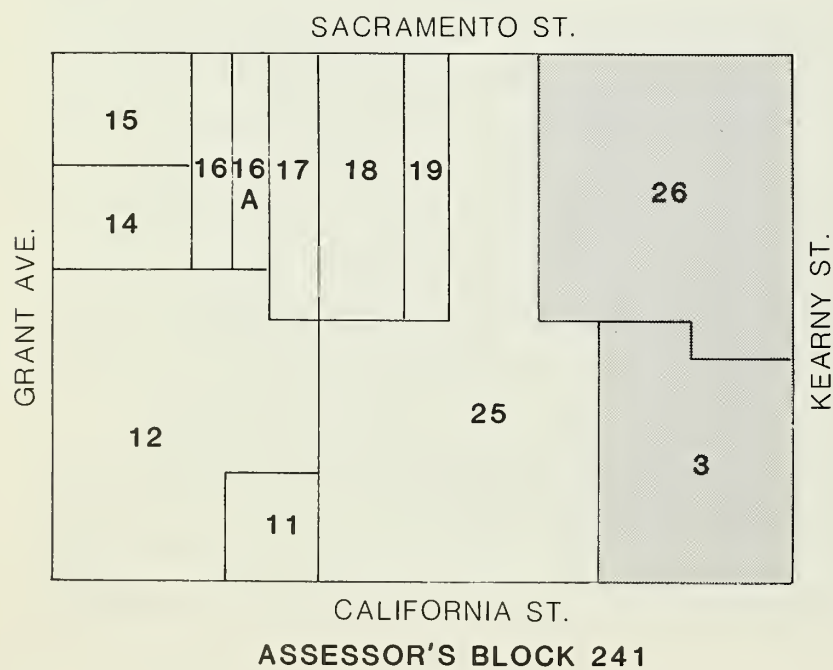
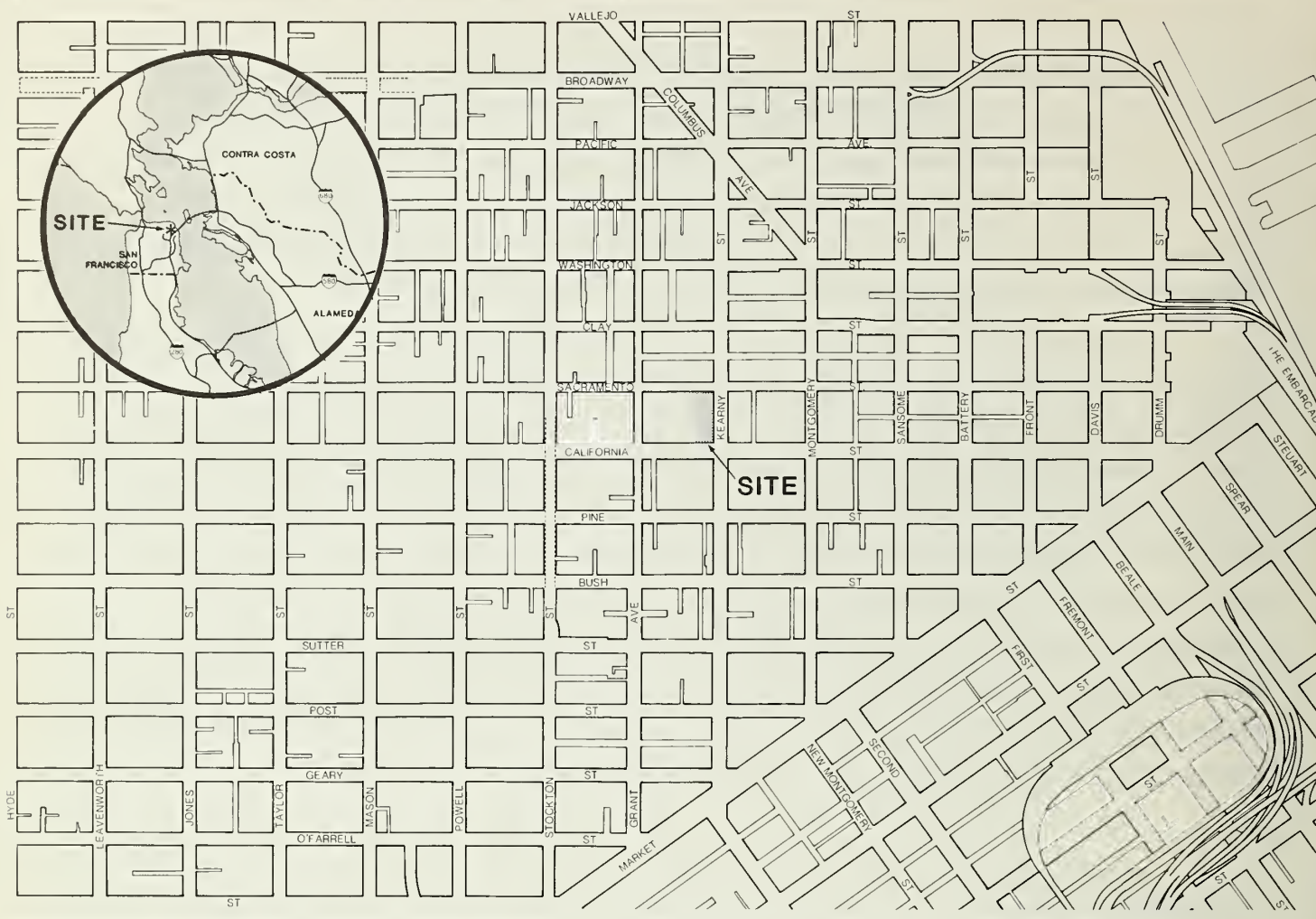
The 31,822-sq.-ft. site includes Lots 3 and 26 of Assessor's Block 241, in the financial district (see Figure 1, p. 2). The site is in the C-3-O (Downtown Office) Use District, and the 250-S Height and Bulk District. The basic allowable FAR is 9:1. The maximum allowable FAR with the use of Transferable Development Rights is 18:1.

The 34-story Hartford building abuts the site on the west, and fronts on California Street with a two story garage and service entrance that fronts on Sacramento Street. The 22-story International Building is across California Street, south of the site. The 33-story 580 California Street Building and the 10-story, 530 Kearny Street Building are across Kearny Street, east of the site. Four three-story buildings are across Sacramento Street, north of the site, including the Chinese Chamber of Commerce Building.


The site is occupied by two structures. The existing nine-story 600 California Street building (Lot 3) is owned and occupied entirely by offices of the Federal Home Loan Bank. A three-story parking garage at 551 Kearny Street, also owned by the Bank, occupies the northern portion of the site (Lot 26). Both buildings would be demolished for the project. The existing 600 California Street building contains about 93,086 gsf of office space and 8,386 gsf of basement area, with 29 parking spaces. The garage at 551 Kearny contains 201 parking spaces and a small service office occupied by Hertz Rent-A-Car Corporation. The project would add to the site about 234,914 new gsf of office; 15,600 new gsf of retail; 7,500 gsf of open space; replace 230 parking spaces; and add up to three service loading spaces, and two van service spaces.

II. INTRODUCTION

A tiered EIR will be prepared for the proposed 600 California Street, Federal Home Loan Bank of San Francisco project pursuant to Sections 21093 and 21094 of the Public Resources Code, California Environmental Quality Act (CEQA). The EIR will be tiered from the Downtown Plan EIR (EE81.3, Final EIR, certified October 18, 1984) and will analyze project-specific impacts. The EIR will discuss potentially significant effects that were not examined in the Downtown Plan EIR and will include applicable mitigation measures for site specific effects. Cumulative impacts of the development forecast in the C-3 districts to the year 2000 are addressed in the Downtown Plan EIR. That cumulative analysis will not be repeated in the EIR for this project. The Downtown Plan EIR may be examined at the Department of City Planning, 450 McAllister Street, Sixth Floor; the San Francisco Main Library; and various branch libraries.



LEGEND

 PROJECT SITE
 ASSESSOR'S BLOCK 241
 LOTS 3 and 26

3 LOT NUMBER

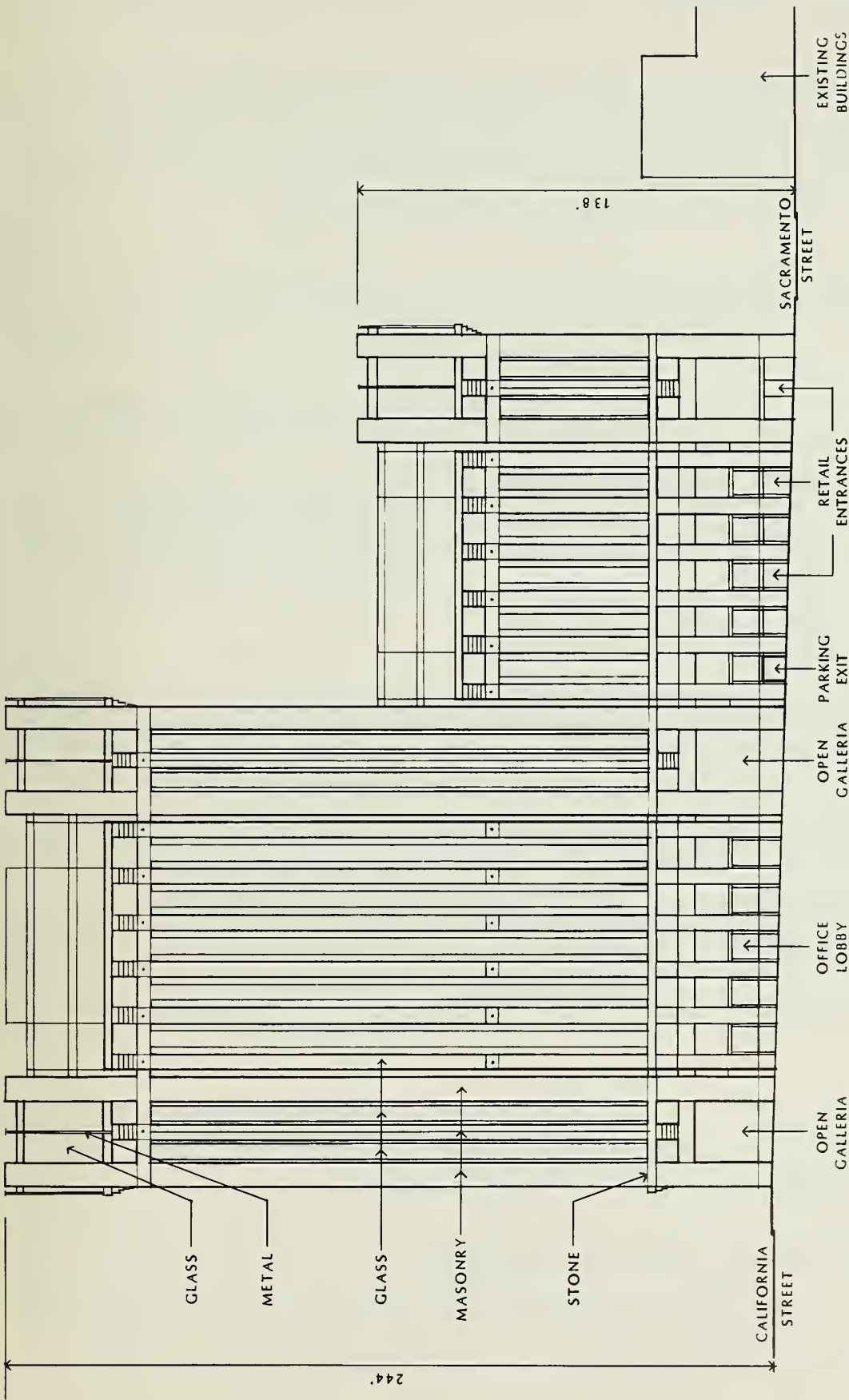


0 FEET 200

600 California Street
 Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 1
SITE AND VICINITY



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: Kohn Pedersen Fox Associates

FIGURE 2
KEARNY STREET ELEVATION

Tiered Environmental Impact Report

Where a prior environmental impact report has been prepared and certified for a program, plan, policy or ordinance, the lead agency for a later project that meets the specified requirements is required (as of January 1, 1986) to examine significant effects of the later project upon the environment, with exceptions, by using a tiered report.

Agencies are required to tier EIRs which they prepare for separate but related projects including general plans, zoning changes and development projects, in order to avoid repetitive discussions of the same issues in successive EIRs and ensure that EIRs prepared for later projects which are consistent with a previously approved policy, plan, program, or ordinance concentrate on environmental effects which may be mitigated or avoided in connection with the decision on each later project. Tiering is appropriate when it helps a public agency to focus on the issues ripe for decision at each level of environmental review and in order to exclude duplicative analysis of environmental effects examined in previous environmental impact reports. Environmental impact reports shall be tiered wherever feasible, as determined by the lead agency.

The law directs that where a prior EIR has been prepared and certified as noted above, the lead agency shall examine significant effects of the later project on the environment by using a tiered EIR, except that the report on the later project need not examine those effects which were either mitigated or avoided as a result of the prior EIR, or examined at a sufficient level of detail in the prior EIR to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

The Initial Study is to assist the lead agency in making the determinations required for tiering.

III. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

The proposed project is examined in this Initial Study to identify potential effects on the environment. The cumulative impacts of growth in the C-3 districts to the year 2000

were adequately analyzed in the Downtown Plan EIR. It is important to understand the long-term nature of the cumulative analysis of growth over time. The cumulative analysis in the Downtown Plan EIR addresses growth through the year 2000. That analysis of cumulative impacts remains current and valid and there are no new significant effects. Some project-specific potential effects have been determined to be potentially significant, and will be analyzed in an environmental impact report (EIR). They include: the relationship of the project to the Master Plan including the Downtown Plan and the Planning Code; visual quality; project-related transportation; traffic-generated air quality effects; shadow; wind; project-related employment; and cultural resources (archaeology).

B. EFFECTS FOUND TO BE INSIGNIFICANT

The following potential impacts were determined either to be insignificant or to be mitigated through measures included in the project. These items require no further environmental analysis in the EIR:

Land Use: The proposed office and retail uses are principal permitted uses in the C-3-0 District; the project would be compatible with existing and proposed development in the vicinity; it would continue and intensify office uses now existing on the site, and add retail uses.

Glare: Mirrored glass would not be used (see the mitigation measure on p. 31).

Housing: The project would comply with the Office Affordable Housing Production Program Ordinance (see the mitigation measures on page 11). Cumulative and indirect effects including those of the project are addressed in the EIR prepared for the Downtown Plan.

Construction and Operational Noise: The project construction phase would have short-term impacts on the noise environment in the site vicinity. Pile driving would not be required for project construction. Mitigation measures to reduce construction noise are included as part of the project (see p. 31). After completion, building operation and project-related traffic would not perceptibly increase noise levels in the site vicinity. Operational noise would be regulated by the San Francisco Noise Ordinance and the

project would conform to the Noise Guidelines of the Environmental Protection Element of the Master Plan.

Construction Air Quality: Project construction would have short-term impacts on air quality in the site vicinity. Mitigation measures to reduce particulate and hydrocarbon emissions generated during construction activities are included as part of the project (see pp. 31-32).

Utilities/Public Services: The project would increase the demand for utilities and public services but would not require additional personnel or equipment.

Biology: The project site is completely developed; therefore, the project would not affect vegetation or wildlife.

Geology/Topography: A preliminary geotechnical investigation has been made for the project, and a final detailed geotechnical report would be prepared prior to commencement of construction, by a California-licensed geologic engineer. The project sponsor and contractor would follow the recommendations of the final report regarding any excavation and construction for the project. Measures to mitigate potential impacts associated with excavation and dewatering are included as part of the project (see p. 32).

Water: The site is completely covered by impervious surfaces; therefore, the project would not affect drainage patterns or water quality. See also the measures referenced above to mitigate potential impacts of dewatering and excavation.

Energy/Natural Resources: The project would be designed to comply with performance standards of Title 24 of the California Administrative Code, regarding energy conservation. Its annual energy budget would be about 77,600 Btu per sq. ft., or about 54% of the allowable budget of 144,000 Btu per sq. ft. Peak electrical energy and natural gas use would coincide with PG&E's systemwide peaks. Cumulative and indirect effects including those of the project are addressed in the EIR prepared for the Downtown Plan. Energy mitigations measures would be included as part of the project (see pp. 33-34).

Hazards: The project would not create a health hazard or be affected by hazardous uses. Mitigation measures to assure project compliance with the City's Emergency Response Plan are included in the project (see p. 34).

A. <u>COMPATIBILITY WITH EXISTING ZONING AND PLANS</u>	Not <u>Applicable</u>	<u>Discussed</u>
*1) Discuss any variances, special authorization, or changes proposed to the City Planning Code or Zoning Map, if applicable.	_____	<u> X </u>
*2) Discuss any conflicts with the Comprehensive Plan of the City and County of San Francisco, if applicable.	_____	<u> X </u>
*3) Discuss any conflicts with any other adopted environmental plans and goals of the City or Region, if applicable.	<u> X </u>	_____

The Downtown Plan, and the Planning Code sections implementing it, contain controls of the scale, intensity, and location of growth in downtown San Francisco; architectural preservation; open space; sunlight access; wind; and transportation.

The project would be consistent with the Downtown Plan (with allowable exceptions-- , see below) and the zoning for the site, and would thus meet this requirement for a tiered EIR. The Chinatown Plan study area adjoins the site on the north. The relationship of the project to the Chinatown Plan will be discussed in the EIR. (Interim Controls for Chinatown were initiated June 1986, and the Chinatown Plan is in process.)

The project would require exceptions in accordance with the provisions of Section 309 under Section 270 Bulk Limits to exceed the maximum diagonal and length dimensions and the maximum floor area sizes at the upper tower portions of the building and at some of the lower tower portions. The project would also require an exception from the required 15-ft. setback from interior property lines, or center of street specified in Planning Code Section 132.1(c) Separation of Towers. Exception to the setback requirement may be permitted in accordance with the provisions of Section 309 under Section 132.1 subsections (c)2B and (c)2C. The project would require approval under Sections 309 and 321 of the City Planning Code. The project's relationship to the Downtown Plan and Planning Code will be discussed in the EIR.

The project would not conflict with adopted environmental plans or goals.

*Derived from State EIR Guidelines, Appendix C, normally significant effect.

B. ENVIRONMENTAL EFFECTS

Yes No Discussed

1) Land Use. Could the project:

- * (a) Disrupt the physical arrangement of an established community?
- (b) Have any substantial impact upon the existing character of the vicinity?

___	<u>X</u>	<u>X</u>
___	<u>X</u>	<u>X</u>

The project site is located in the City's financial district, an area characterized by office buildings of various ages and sizes. Upper floors of structures are generally office with ground floors containing banking, office-support retail, and parking. The project would replace existing office uses, at a greater intensity, and would add retail uses to the site. The number of parking spaces at the site would remain the same.

Section 210.3 of the City Planning Code states that the C-3-0 (Downtown Office) District, "playing a leading role in finance corporate headquarters and service industries, and serving as an employment center for the region, consists primarily of high quality office development." The project would be compatible with the C-3-0 land use designation.

Land use to the south, east and west in the site vicinity consists predominantly of high-rise office buildings, many of which are related to banking, finance and commerce, with some ground-level retail uses. Land use to the north and northwest is predominantly low- and mid-rise commercial buildings characteristic of Chinatown which is northwest of the site.

As noted, neighboring buildings to the south, east and west are newer high-rise high intensity office buildings in the financial district, including the Bank of America building (diagonally southeast across California Street from the site), the recently completed 580 California Street building (east of the site across Kearny Street), the Hartford building (immediately west of site) and the International building (south of the site across California Street). There are four low-rise buildings (3 stories) located north of the site across Sacramento St. The buildings south, and east in the immediate site vicinity range in height from about 325 ft. (International building) to 780 ft. (Bank of America). Most of the buildings north and west of the site are low- to mid-rise and range in heights from about 35 to 45 ft.

Buildings under construction in the site vicinity include the 505 Montgomery and 456 Montgomery buildings at the northwest and southeast corners of the intersection of Montgomery and Sacramento Streets.

The nearest open space in the site vicinity is A.P. Gianninni Plaza, part of the Bank of America headquarters building, located diagonally across California Street from the project site. St. Mary's Square is southwest of the site in the block bounded by Kearny and Grant through the block between California and Pine Streets. Portsmouth Square is two blocks north of the site between Kearny Street and Brenham and Washington and Clay Streets. The Chinese Playground is located about one block west of the site on Sacramento Street between Stockton and Grant Streets.

The project would include development of an office building with ground-level retail use and basement parking and would not change existing blocks or street grids; it would not disrupt or divide the physical arrangement of the area. The project would be similar to land uses in the site vicinity. The intensification of office uses at the site which would result from the project would continue high-rise office development in the site vicinity. In view of the above, the project would not have a substantial impact on the existing office/retail character of the vicinity. This topic does not require further analysis in the EIR.

2) <u>Visual Quality.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Have a substantial, demonstrable negative aesthetic effect?	<u>X</u>	<u>—</u>	<u>X</u>
(b) Substantially degrade or obstruct any scenic view of vista now observed from public areas?	<u>—</u>	<u>X</u>	<u>X</u>
(c) Generate obstrusive light or glare substantially impacting other properties?	<u>—</u>	<u>X</u>	<u>X</u>

The project's design, appearance and possible effects on views will be discussed in the EIR. Mirrored glass would not be used in the project; the building would not result in glare affecting other properties (see mitigation, p. 31). The EIR will, therefore, not discuss glare.

3) <u>Population.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Induce substantial growth or concentration of population?	<u>—</u>	<u>X</u>	<u>X</u>
* (b) Displace a large number of people (involving either housing or employment)?	<u>—</u>	<u>X</u>	<u>X</u>
(c) Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	<u>—</u>	<u>X</u>	<u>X</u>

Project specific employment information regarding number and type of employees on site, with existing conditions and with the project, will be included in the EIR.

The project would generate a demand for 91 dwelling units according to the Office Affordable Housing Production Program (OAHPP) formula. The project must comply with the OAHPP, Ordinance No. 358-85. Cumulative and indirect effects including those of this project are addressed, and may be found in, the Downtown Plan EIR. That analysis will not be repeated in the 600 California Street, Federal Home Loan Bank of San Francisco, EIR.

The Downtown Plan EIR concluded that population effects resulting from development in the C-3 districts under the Downtown Plan would not be significant. That conclusion would remain true with the project. The Downtown Plan EIR (EE81.3, Final EIR certified October 18, 1984) may be examined at the Department of City Planning, 450 McAllister Street; the San Francisco Main Library; and various branch libraries.

The 235 Pine St. EIR Comments and Responses (84.432E, FEIR certified April 17, 1986) discuss the current validity of the Downtown Plan EIR assumptions and analysis with regard to housing amongst other subjects. The DTPEIR forecasts are considered to be long-term forecasts that focus on the amounts and types of growth expected through the year 2000. No attempt was made to forecast on an annual or short-term basis, and the long-term forecasts include a number of shorter-term ups and downs which average out over time. In general, it was concluded in the 235 Pine FEIR that no new data or information are available that would indicate that the long-term forecasts prepared for the DTPEIR are substantially off-target or misleading. With regard to the specific issue of housing impacts, it was concluded that the assumptions in the DTPEIR remain valid and the analysis remains current. Thus, for example, it was observed in the 235 Pine Comments and Responses that housing completions in San Francisco were about 940 units in 1983-84 and about 1,000 units in 1985. These figures fall squarely within the DTPEIR forecast of 600, 1,500 units per year on average (235 Pine St. Comments and Responses, p. 54).

4) <u>Transportation/Circulation.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	___	<u>X</u>	<u>X</u>
(b) Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	___	<u>X</u>	<u>X</u>
(c) Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?	___	<u>X</u>	<u>X</u>
(d) Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	<u>X</u>	___	<u>X</u>

Increased employment at the site would increase demand on existing transportation systems. The number of pedestrians in the area would also increase. The project would not alter existing circulation patterns except during construction; its effects on circulation during construction will be discussed in the EIR. The project would retain the existing number (230) of parking spaces on the site, and would move the existing parking entrance from Kearny Street to Sacramento Street. The project would alter existing localized circulation patterns, related to site parking. The project would not be expected to alter other circulation patterns. Localized transportation impacts of the project, including potential effects on Muni service on Sacramento Street will be analyzed in the EIR.

The cumulative transportation effects of development in the C-3 districts, including the project, are analyzed in the Downtown Plan EIR. The Planning Commission, in certifying the Downtown Plan EIR, determined that cumulative transportation impacts would have a significant impact. The cumulative analysis in the Downtown Plan regarding transportation will be summarized and incorporated by reference into the 600 California Street EIR, and the project effects in relation to cumulative impacts will be discussed. The analysis in the Downtown Plan EIR remains current regarding future and project conditions.

5) <u>Noise.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Increase substantially the ambient noise levels for adjoining areas?	___	<u>X</u>	<u>X</u>
(b) Violate Title 24 Noise Insulation Standards, if applicable?	___	<u>X</u>	<u>X</u>
(c) Be substantially impacted by existing noise levels?	___	<u>X</u>	<u>X</u>

Project Operation

The noise environment of the site, like all downtown San Francisco, is dominated by vehicular traffic noise. The Downtown Plan EIR indicates a day-night average noise level (Ldn) of 75 dBA on California Street and 76 dBA on Kearny Street adjacent to the site in 1984./1,2/ The Environmental Protection Element of the Master Plan contains guidelines for determining the compatibility of various land uses with different noise environments. For office and commercial uses (including retail activities), the guidelines recommend no special noise control measures in an exterior noise environment up to a Ldn of 70 dBA. For noise levels of 75 dBA and above, the guidelines recommend an analysis of noise reduction requirements and inclusion of noise insulation features in the building design. The project sponsor has indicated that noise insulation measures would be included as part of the design (see mitigation, p. 31). The proposed structure would not include housing, so Title 24 Noise Standards would not be applicable.

Project operation would not result in perceptibly greater noise levels than those existing in the area. The amount of traffic generated by the project during any hour of the day, and cumulative traffic increases at the time of project completion, would cause traffic noise levels to increase by one dBA or less. To produce a noticeable increase in environmental noise, a doubling of existing traffic volume would be required; traffic increases of this magnitude would not occur with anticipated cumulative development including the project./3/

The project would be required to comply with the San Francisco Noise Ordinance, San Francisco Police Code Section 2909, "Fixed Source Noise Levels," which regulates mechanical equipment noise. The project site and surrounding area are within the C-3-0 district. In this district, the ordinance limits equipment noise levels at the property line to 70 dBA between 7:00 a.m. to 10:00 p.m. and 60 dBA between the hours of 10:00 p.m. and 7:00 a.m. During lulls in traffic, mechanical equipment generating 70 dBA could dominate the noise environment at the site. The project engineer and architect would include design features in the building to limit mechanical equipment noise levels to 60 dBA. As equipment noise would be limited to 60 dBA to meet the nighttime limit, it would not be perceptible above the ambient noise levels in the project area; operational noise requires no further analysis and will not be included in the EIR.

Construction

Demolition, excavation and building construction would temporarily increase noise in the site vicinity.

Project construction would take place over a maximum of 24 months, and would increase noise levels in surrounding areas. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers between noise source and listener.

Typical construction noise levels, other than for pile driving range from 78 to 89 dBA at 50 ft. Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the City Police Code). The ordinance requires that sound levels of construction equipment other than impact tools not exceed 80 dBA at a distance of 100 ft. from the source. Impact tools (jackhammers, piledrivers, impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work at night, from 8:00 p.m. to 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property lines, unless a special permit is authorized by the Director of Public Works.

The project would not require piledriving.

Nearly all of the structures in the project vicinity are office buildings except buildings across Sacramento Street, about 140 ft. west of the property line of the project site, where residential units occupy the upper floors. Exterior noise levels from the noisiest phases of construction would be about 80 dBA at a distance of 140 ft. Noise at levels greater than 60 dBA can interfere with normal speech and concentration; noise levels greater than 70 dBA would require workers and residents to close windows or shout to communicate. With the windows open, the buildings would provide a 10 dBA reduction of exterior noise levels, resulting in interior noise levels during the noisiest phases of construction of about 70 dBA at 140 ft., interfering with speech and concentration. Interior noise levels with the windows closed would be about 20 dBA lower than exterior noise levels.

No additional developments are planned in the project area which would coincide with the construction schedule of the proposed project.

In summary, during the majority of construction activity, noise levels would be expected to be above existing levels in the area. There would be times, particularly during the operation of impact wrenches, when noise would interfere with indoor activities in nearby offices, retail stores and residential units on Sacramento Street. Mitigation measures are included in the project to reduce construction noise (see p. 31). Construction noise requires no further analysis and will not be included in the EIR.

NOTES - Noise

/1/ San Francisco Department of City Planning, Downtown Plan Environmental Impact Report (EIR), EE81.3, certified October 18, 1984, Vol. 1, Table IV.J.2.

/2/ dBA is a measure of sound in units of decibels (dB). The "A" denotes the A-weighted scale, which simulated the response of the human ear to various frequencies of sound.

Ldn, the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noises; noise between 10:00 p.m. and 7:00 a.m. is weighted 10 dBA higher than daytime noise.

/3/ See Downtown Plan EIR, Vol. 1, Continuous Section IV.E. generally and Section IV.J., pp. IV.J.8 - 18. Increases of 1 dBA or less in environmental noise are not noticeable by most people outside a laboratory situation (National Academy of Sciences, Highway Research Board, Research Report No. 117 (1971)). (See also FHWA Highway Traffic Noise Prediction Model, Report #FHWA-RD-77-108, December, 1978, p. 8, regarding doubling of traffic volumes producing increases of 3 dBA or more, which are noticed by most people.)

6)	<u>Air Quality/Climate.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
*	(a) Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	_____	<u>X**</u>	<u>X</u>
*	(b) Expose sensitive receptors to substantial pollutant concentrations?	_____	<u>X</u>	<u>X</u>
	(c) Permeate its vicinity with objectionable odors?	_____	<u>X</u>	_____
	(d) Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?	<u>X</u>	_____	<u>X</u>

** The site-specific traffic impacts created by this project are not expected to be significant, as noted in the discussion herein. However, the localized air quality effects of the project will be discussed in the EIR.

Demolition, grading and other construction activities would temporarily affect local air quality for up to two years, causing a temporary increase in particulate dust and other pollutants. Dust emission during demolition and excavation would increase particulate concentrations near the site. Dustfall can be expected at times on surfaces within 200 to 800 ft. Under high winds exceeding 12 miles per hour, localized effects including human discomfort might occur downwind from blowing dust. Construction dust is composed primarily of large particles that settle out of the atmosphere more rapidly with increasing distance from the source. More of a nuisance than a hazard for most people, this dust could affect persons with respiratory diseases, as well as sensitive electronics or communications equipment. The project sponsor would require the contractor to wet down the construction site twice a day during construction to reduce particulates by at least 50% (see mitigation, pp. 31-32).

Diesel-powered equipment would emit, in decreasing order by weight, nitrogen oxides, carbon monoxide, sulfur oxides, hydrocarbons, and particulates. This would increase local concentrations temporarily but would not be expected to increase the frequency of violations of air quality standards. The project sponsor would require the project contractor to maintain and operate construction equipment in such a way as to minimize exhaust emissions (see mitigation, pp. 31-32). Construction air quality effects require no further analysis and will not be included in the EIR.

The cumulative effects on air quality of traffic emissions from traffic generated by development in the C-3 districts including the project are analyzed in the Downtown Plan EIR. The project effects in relation to cumulative effects will be discussed and localized air quality effects of the project will be discussed in the EIR for the project.

Potential shadowing impacts of the project on sidewalks, parks and other open spaces will be discussed in the EIR. The analysis will include sun path and shadow diagrams.

Section 148 of the Planning Code establishes comfort criteria of 11 mph equivalent wind speed for pedestrian areas and 7 mph for seating areas, not to be exceeded more than 10% of the time, year-round between 7:00 a.m. and 6:00 p.m. Project wind effects including the results of wind tunnel testing, and the effects of the project in relation to the Downtown Plan criteria will be discussed in the project EIR.

7)	<u>Utilities/Public Services.</u>	Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
*	(a)	Breach published national, state or local standards relating to solid waste or litter control?	___	<u>X</u>	___
*	(b)	Extend a sewer trunk line with capacity to serve new development?	___	<u>X</u>	<u>X</u>
	(c)	Substantially increase demand for schools, recreation or other public facilities?	___	<u>X</u>	<u>X</u>
	(d)	Require major expansion of power, water, or communications facilities?	___	<u>X</u>	<u>X</u>

The Downtown Plan EIR concluded that demand for utilities and public services resulting from development in the C-3 districts under the Downtown Plan would not be significant. The project would fall within this development forecast. The Downtown Plan EIR analysis remains current and valid for future and project conditions. The Downtown Plan EIR (EE81.3, Final EIR certified October 18, 1984) may be examined at the Department of City Planning, 450 McAllister Street; the San Francisco Main Library and various branch libraries. This topic requires no further analysis in the EIR.

8)	<u>Biology.</u>	Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
*	(a)	Substantially affect a rare or endangered species of animal or plant or the habitat of the species?	___	<u>X</u>	___
*	(b)	Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	___	<u>X</u>	<u>X</u>
	(c)	Require removal of substantial numbers of mature, scenic trees?	___	<u>X</u>	___

The site is covered by impervious surfaces. The project would not affect plant or animal habitats. This topic will not be discussed in the EIR.

9)	<u>Geology/Topography.</u>	Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
	(a)	Expose people or structures to major geologic hazards (slides, subsidence, erosion, and liquefaction)?	___	<u>X</u>	<u>X</u>

(b) Change substantially the topography of any unique geologic or physical features of the site?	<u>Yes</u> ____	<u>No</u> ____ <u>X</u> ____	<u>Discussed</u> ____
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The project site is at about 36 ft., San Francisco Datum (SFD)./1/ Soils at the site consist of loose to medium-dense sand (approximately five to 10 ft.), very stiff clayey and sandy soil (approximately 10 ft.), underlain by highly weathered bedrock of interbedded sandstone, and shale./2/ Groundwater levels are expected to be between 10 and 20 ft. below the ground surface./2/

Excavation for the project foundations and parking garage would be conducted to a depth of about six to 16 ft. SFD. The existing basement is at about 24 ft. SFD. Maximum excavation depth would be to about 30 ft. below grade or about 18 ft. below the existing basement (six ft. SFD)./2/ The project would be supported by a five-foot-thick mat foundation bearing on bedrock on the western portion of the site and on clayey soil on the eastern portion of the site./2/

Dewatering would be required during excavation, and could cause some settlement of nearby buildings. The project would include measures to mitigate this potential impact (see p. 32).

Pit walls would be shored up to prevent lateral movement during excavation. The adjacent Hartford Building may need to be underpinned should excavation go below the base of its foundation, to avoid such damage as cracking of walls or foundations or sagging of floors. The building contractor must comply with the San Francisco Building Code and the Excavation Standards of the California Occupational Safety and Health Agency. Pre-construction surveys of adjacent streets and buildings would be conducted if so recommended in the final soils report and would determine what measures, if any, would be needed to protect these structures.

The closest active faults to San Francisco are the San Andreas Fault, about nine miles southwest of Downtown, and the Hayward and Calaveras Faults, about 15 and 30 miles east of Downtown, respectively. The project area would experience Strong (Intensity Level D, general but not universal fall of brick chimneys and cracks in masonry and brick work) groundshaking during a major earthquake./3/ The site is within an area of liquefaction or subsidence./4/ However, the preliminary geotechnical report determined

that the site would not be susceptible to severe liquefaction and subsidence./2/ It is not within an area of potential tsunami or seiche flooding./5/

The project sponsor would follow the recommendations of structural and foundation reports to be prepared for any excavation and construction on the site. The project must meet current seismic engineering standards of the San Francisco Building Code which include earthquake-resistant design and materials. The Code is designed to allow for some structural damage to buildings but not collapse during a major earthquake (see also Mitigation Measures, p. 32, for the project's emergency response plan). The project would replace the existing Federal Home Loan Building and the parking garage, both built prior to current seismic safety code standards and therefore generally more susceptible to earthquake damage.

The project would not have a substantial effect on geology or topography, and this topic will not be discussed in the project EIR.

NOTES - Geology/Topography

/1/ San Francisco City Datum established the City's "0" point for surveying purposes at approximately 8.6 ft. above mean sea level.

/2/ Harding Lawson Associates, Phase 1 Geotechnical Consultation, Proposed Office Building, California and Kearny Streets, February 7, 1986, available for review at the Department of City Planning, Office of Environmental Review, 450 McAllister Street, Sixth Floor. A final report will be prepared for the project.

/3/ URS/John A. Blume and Associates, San Francisco Seismic Safety Investigation, 1974. Groundshaking intensities that would result from a major earthquake were projected and classified on a five-point scale ranging from E (Weak) through A (Very Violent).

/4/ Ibid. The project site is included within an area of liquefaction potential and in a subsidence hazard area. Liquefaction is the transformation of granular material, such as loose, wet sand, into a fluid-like state similar to quicksand. Subsidence is a lowering of the ground surface from settlement of fill or alluvium. This can occur from groundshaking, withdrawal of groundwater, or other causes.

/5/ A.W. Garcia and J.R. Houston, Type 16 Floor Insurance Study: Tsunami Predictions for Monterey and San Francisco Bays and Puget Sound, Federal Insurance Administration, Department of Housing and Urban Development, November, 1975. Maximum flood elevations for earthquake-induced tsunamis have been estimated to be about elevation -3.5 ft. for a 100-year event and 0.5 ft. for a 500-year event (elevations from San Francisco Datum, 8.64 ft. above mean sea level), both of which would be below site grade.

10) <u>Water</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Substantially degrade water quality, or contaminate a public water supply?	___	<u>X</u>	___
* (b) Substantially degrade or deplete ground water recharge?	___	<u>X</u>	<u>X</u>
* (c) Cause substantial flooding, erosion or siltation?	___	<u>X</u>	___

As discussed above, the project would include excavation to depths that reach the water table, and dewatering could be required. Dewatering could produce localized subsidence, which could damage streets or older buildings in the immediate site vicinity. The sponsor has agreed to measures to mitigate the effects of dewatering (see p. 32). Site runoff would drain into the City's combined sanitary and storm drainage system. The project would not affect drainage patterns or water quality because the site is now entirely covered with impermeable surfaces. No further analysis of this topic is required in the EIR.

11) <u>Energy/Natural Resources</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	___	<u>X</u>	<u>X</u>
* (b) Have a substantial effect on the potential use, extraction, or depletion of a natural resource?	___	<u>X</u>	<u>X</u>

Annual energy consumption by existing office and retail uses on the site is about 3.07 million kWh of electricity and about 35,600 therms of steam, equal to about 35.0 billion Btu at the source./1,2/ A minimal but unknown amount of energy is consumed by the parking garage on the site. Natural gas is not used by existing uses at the site.

Removal of existing structures would require an unknown amount of energy. Fabrication and transportation of building materials, worker transportation, site development, and building construction would require about 641 billion Btu of gasoline, diesel fuel, natural gas, and electricity./3/ Distributed over the estimated 50-year life of the project, this would be about 12.8 billion Btu per year, or about 36% of building energy requirements.

New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Administrative Code. Documentation showing

compliance with these standards is submitted with the application for the building permit and is enforced by the Bureau of Building Inspection.

Table 1, p. 22, shows the estimated operational energy which would be used by the project. Project demand for electricity during PG&E's peak electrical load periods, July and August afternoons, would be about 740 kW, an estimated 0.005% of PG&E's peak load of 16,000 MW./4/ Project demand for natural gas during PG&E's peak natural gas load periods, January mornings, would be 7 million Btu per day, or about 0.2% of PG&E's peak load of about 3.7 billion Btu per day./4/ Annual and peak daily electricity and natural gas consumption are shown in Figures 3 and 4, pp. 23-24. Measures to reduce energy consumption are included as part of the project (see pp. 33-34).

Project-related transportation would cause additional, off-site energy consumption. Annual project-related trips (about 189,000 auto vehicle trip ends [vte], about 184,000 bus person trips ends [pte], 18,300 train pte, 7,700 ferry pte, 14,100 jitney/van/taxi/ motorcycle/charter bus pte, 210,000 BART pte, and 281,000 Muni electric pte) would require about 121,700 gallons of gasoline and diesel fuel and about 1.29 million kWh of electricity annually, as indicated in Table 2, p. 25. These figures were calculated based on data contained in the Downtown Plan EIR. The total annual transportation energy demand, converted with at-source factors to a common thermal energy unit, would be about 30.8 billion Btu, the energy equivalent of 5,500 barrels of oil. This projected use is based upon the mix of highway vehicles in California in 1987. Vehicle fuel use is expected to decrease as the vehicle fleet becomes more efficient.

Projections of electrical use for growth that would occur under the Downtown Plan, as analyzed in the Downtown Plan EIR, indicate an increase of about 330 to 350 million kWh per year between 1984 and 2000, as a result of all new development occurring in the C-3 district. Natural gas consumption is expected to increase by 470 million cubic ft. (about five million therms) per year during the same time period, of which 210 cubic ft. (about two million therms) per year would be for office uses.

Increased San Francisco energy demands to the year 2000 would be met by PG&E from nuclear sources, oil and gas facilities, hydroelectric and geothermal facilities, and other sources such as cogeneration, wind and imports. PG&E plans to continue receiving most of its natural gas from Canada and Texas under long-term contracts.

TABLE 1: ESTIMATED PROJECT ENERGY USE/a/

Daily Natural Gas Consumption/b/

Estimated natural gas consumption per sq. ft.	11.5 Btu/c/
Estimated daily natural gas consumption	37.5 Therms

Monthly Electric Consumption/b/

Estimated electrical consumption per sq. ft.	0.86 kWh (8,810 Btu)/d/
Estimated total electrical consumption	279,000 kWh (2.8 billion Btu)

Annual Consumption

Estimated total annual natural gas consumption	11,060 Therms (1.11 billion Btu)
Estimated total annual electrical consumption	3.4 million kWh (34.8 billion Btu)
Estimated total annual energy consumption	35.9 billion Btu (6,410 barrels of oil)

/a/ Energy use includes space conditioning, service water heating and lighting in accordance with allowable limits under Title 24. Estimated electricity includes an additional three kWh/sq. ft./year, consumed by appliances such as typewriters, computers, coffee makers, etc., than assumed by Title 24 estimates.

/b/ Electricity and gas consumption were calculated for the project by Flack & Kurtz, Consulting Engineers. These calculations are available for review at the Office of Environmental Review, 450 McAllister St.

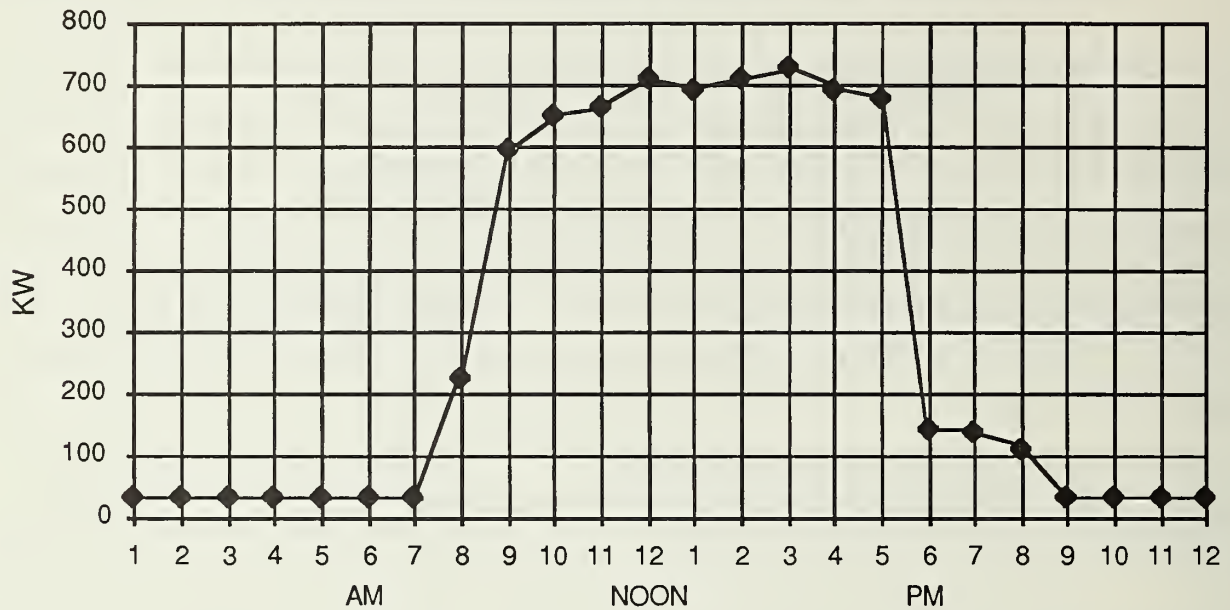
/c/ Btu (British thermal unit): a standard unit for measuring heat. Technically, it is the quantity of heat required to raise the temperature of one pound of water 1 degree Fahrenheit (251.97 calories) at sea level.

/d/ Energy Conversion Factors:	one gallon gasoline	=	125,000 BTU
	one kilowatt (kW)	=	10,239 BTU
	one therm	=	100,000 BTU
	one barrel oil	=	5,600,000 BTU

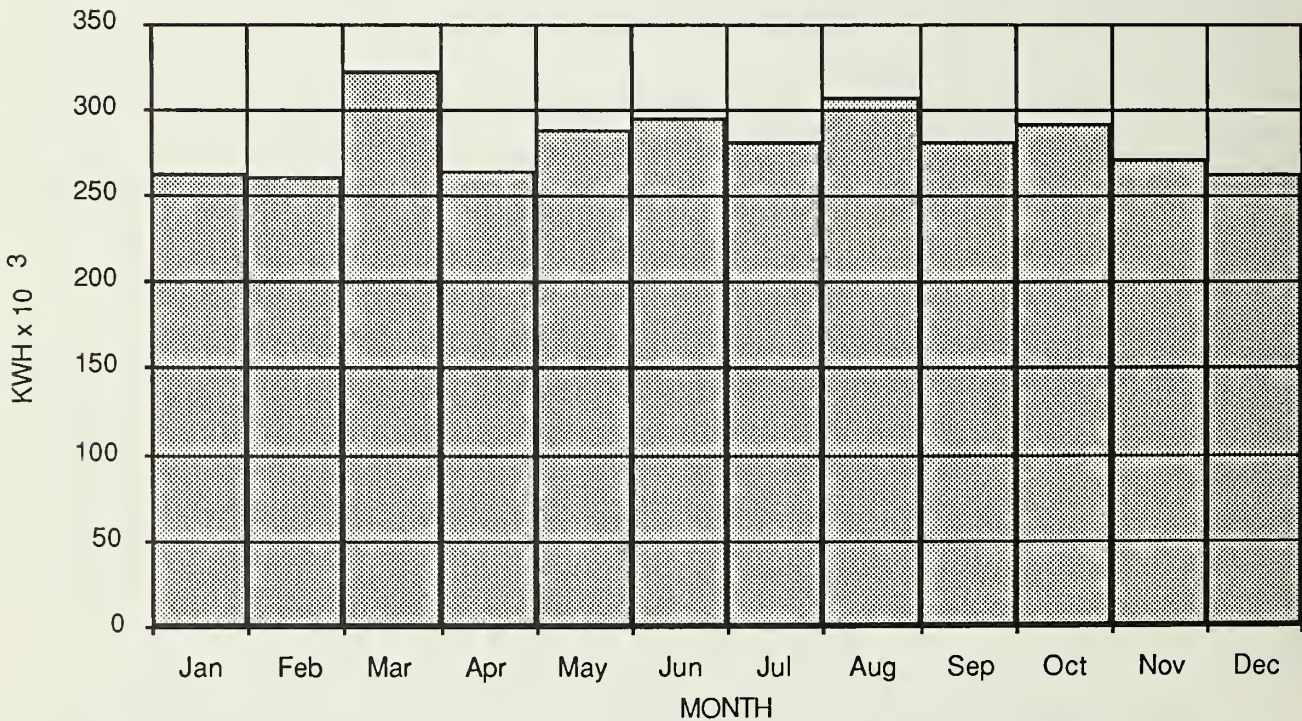
SOURCE: Environmental Science Associates, Inc. and Department of City Planning

The Downtown Plan EIR concluded that energy consumption resulting from development in the C-3 district under the Downtown Plan would not be significant and that conclusion remains valid for the future and project conditions. The Downtown Plan EIR (EE81.3, Final EIR certified October 18, 1984) may be examined at the Department of City Planning, 450 McAllister Street; the San Francisco Main Library; and various branch libraries.

PEAK DAY ELECTRICAL DEMAND BY HOUR (AUGUST)



ANNUAL CONSUMPTION OF ELECTRICITY BY MONTH

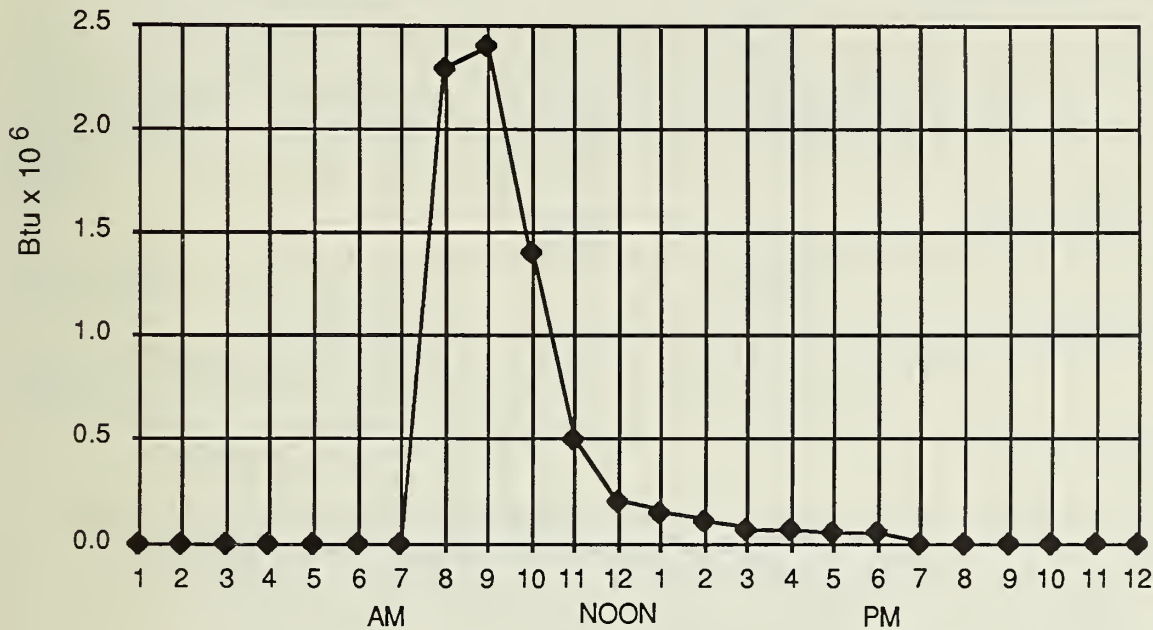


600 California Street
Federal Home Loan Bank of San Francisco

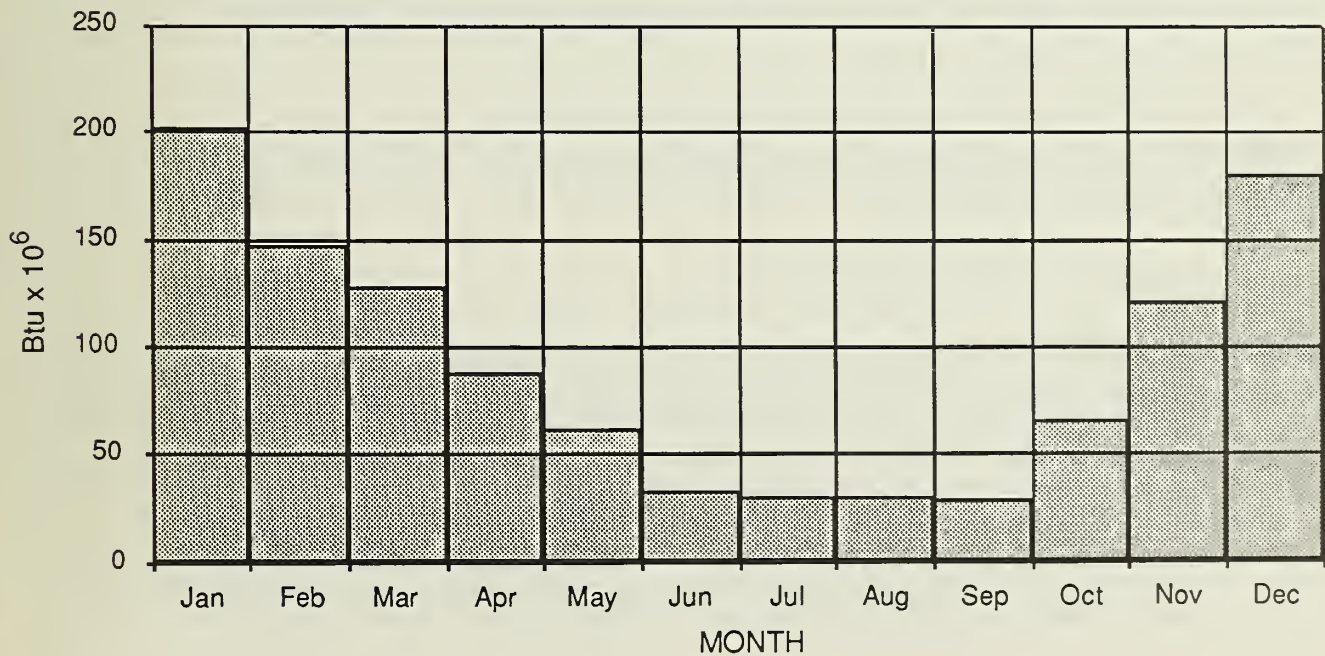
SOURCE: ESA

FIGURE 3
PROJECTED ELECTRICAL LOAD
DISTRIBUTION CURVES

PEAK DAY NATURAL GAS DEMAND BY HOUR (JANUARY)



ANNUAL CONSUMPTION OF NATURAL GAS BY MONTH



600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE 4
PROJECTED NATURAL GAS
DISTRIBUTION CURVES

TABLE 2: PROJECT-RELATED ANNUAL TRANSPORTATION ENERGY CONSUMPTION/a/

	Electricity (kWh)	Gasoline (Gallons)	Diesel (Gallons)	Total Btu (Billion)
Auto/Taxi/Jitney/ Motorcycle/Charter Bus	--	97,000	--	13.6
BART	1,159,000	--	--	11.9
Muni Electric	129,000	--	--	1.3
Regional Bus Systems	--	--	20,450	3.3
SPRR	--	--	4,240	0.69
Project Total	1,290,000	97,000	24,700	30.8

/a/ The methods used to calculate these figures are described in detail in the Downtown Plan EIR, EE81.8, certified November 18, 1984, Appendix N and the associated data is contained in Table No. 6 of that document. Calculations are also based on vehicle miles travelled (see calculations for the project on file at the Department of City Planning, Office of Environmental Review, 450 McAllister Street).

SOURCE: Environmental Science Associates, Inc.

This topic, energy impacts, requires no further analysis and will not be discussed in the EIR.

Average water use is projected to be 21,100 gallons per day. This demand could be accommodated by existing supplies. This topic will not be discussed in the EIR.

NOTES - Energy

/1/ Existing energy use is based on PG&E bills which were available only for the months of March, April, May, June, July, October and November of 1985 and January and February 1986. Energy use for months without available bills was based on months with bills which were expected to be comparable in energy use. To account for a 12-month period, August consumption was estimated to be the same as July, and September was estimated to be the same as October use. For steam use, March, April, June, July, August, September, October, November and December 1985 consumption was based on PG&E bills and March values were used to estimate January and February consumption; April consumption was used to estimate May's consumption in order to account for a 12 month period.

/2/ The British thermal unit (Btu) is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit at sea level; all references to Btu in this Initial Study are at-source values. The term "at-source" means that adjustments have been made in the calculation of the thermal energy equivalent (Btu) for losses in energy that occur during generation, transmission, and distribution of the various energy forms as specified in: ERCDC, 1977, Energy Conservation Design Manual for New Non-Residential Buildings, Energy Conservation and Development Commission, Sacramento, California and Apostolos, J.A., W.R. Shoemaker, and E.C. Shirley, 1978 Energy and Transportation System, California Department of Transportation, Sacramento, California, Project #20-7, Task 8.

/3/ Hannon, B., et al., 1978, "Energy and Labor in the Construction Sector", Science 202:837-847.

/4/ San Francisco Department of City Planning, Downtown Plan Environmental Impact Report (EIR) (EE81.3), certified October 18, 1984, Vol. 1, pp. IV.G.3-4.

12) <u>Hazards</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	_____	<u>X</u>	_____
* (b) Interfere with emergency response plans or emergency evacuation plans?	_____	<u>X</u>	<u>X</u>
(c) Create a potentially substantial fire hazard?	_____	<u>X</u>	<u>X</u>

The project would increase the daytime population in downtown San Francisco. Employees in the proposed building would contribute to congestion if an emergency evacuation of the downtown area were required. An evacuation and emergency response would be developed as part of the proposed project (see p. 34). The project's emergency plan would be coordinated with the City's emergency planning activities. This mitigation measure is proposed as part of the project; thus this topic will not be discussed in the EIR.

The increased number of persons using the site would not substantially increase the fire hazard at the site as the project would be required to conform to the Life Safety provisions of the San Francisco Building Code and Title 24 of the State Building Code. The Fire Department has determined that no additional fire stations would be needed to serve cumulative development until the most major proposals came on-line (such as Rincon Point/South Beach and Mission Bay (Edward Phipps, Assistant Chief, Support Services, letter, July 9, 1984). Therefore, it is not anticipated that the project would create a substantial fire hazard and this issue will not be discussed in the EIR.

13) <u>Cultural</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study?	<u>X</u>	<u> </u>	<u>X</u>
(b) Conflict with established recreational, educational, religious or scientific uses of the area?	<u> </u>	<u>X</u>	<u> </u>
(c) Conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the City Planning Code?	<u> </u>	<u>X</u>	<u>X</u>

Excavation required for the project would occur in existing disturbed soils and fill and 18-ft. below foundations of the existing buildings. Archival research was conducted regarding the possibility of encountering artifacts on the site./1/ The project site historically was situated about one block west of the shoreline at Yerba Buena Cove before 1849 (pre-historic through Spanish-Mexican period). The archival research report indicates that archaeological remains from the Spanish-Mexican, Gold Rush and City Building periods could exist on the site./1/ Such a find could be considered of potential archaeologic and historic significance. Cultural resources will be discussed in the EIR.

The San Francisco Department of City Planning conducted a citywide inventory of architecturally significant buildings in 1976. In that inventory, approximately ten percent of the City's entire stock of buildings were awarded a rating for architectural merit ranging from a low of "0" to a high of "5". The total number of buildings which were rated from "3" to "5" represent less than two percent of the City's entire building stock.

The Foundation for San Francisco's Architectural Heritage conducted a survey which assigned ratings to buildings in the C-3 District. The survey rated buildings from a high of "A" (Highest importance) to "D" (Minor or No Importance). The criteria used in the evaluation were based on guidelines of the National Trust for Historic Preservation, the National Register of Historic Places, and the State Historic Resources Inventory.

The Downtown Plan categorizes historically and architecturally significant buildings into either Category I or II (significant buildings) or Category III or IV (contributory buildings).

It is the intent of the Downtown Plan that only those buildings categorized I, II, III or IV would be protected within the C-3 area.

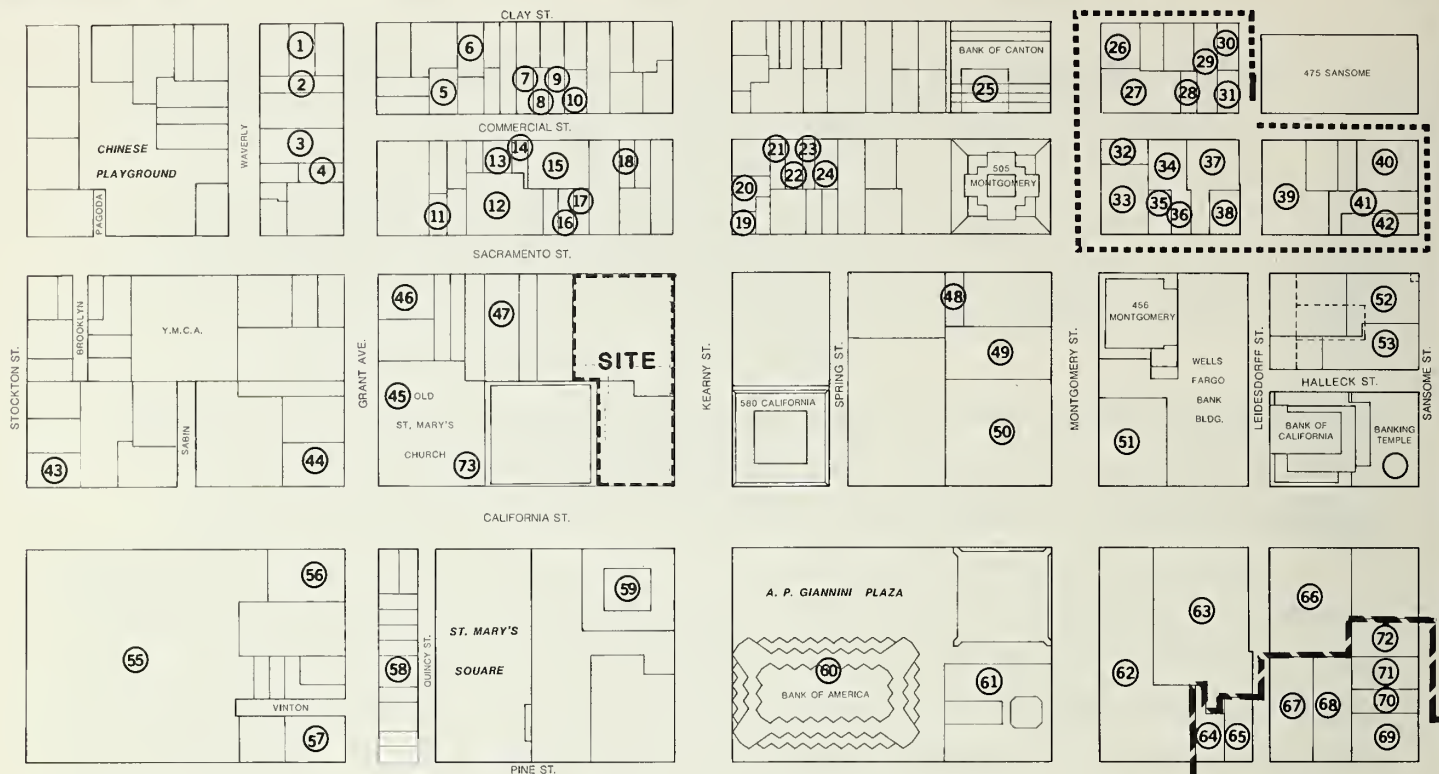
Figure 5, p. 29, identifies those buildings in the project area that are landmarks or are included in the (1) Department of City Planning 1976 Architectural Inventory, the (2) Heritage Survey, and/or (3) the Downtown Plan.

The two buildings which occupy the site, the 600 California Street office building and the 551 Kearny Street parking garage, would be demolished for the project. Neither is designated significant or contributory for architectural merit in the Downtown Plan.

None of the buildings on the project block, including those on the project site, were rated by Heritage in its 1978 survey of the Downtown C-3 District, or are included in Categories I-IV (significant and contributory) for architectural merit in the Downtown Plan and Planning Code. The Kearny-Belden Conservation District of the Downtown Plan, and designated in Article 11 of the City Planning Code, is located about one block south of the project site. Four buildings on the project block are rated in the Department of City Planning's Architectural Inventory of 1976: St. Mary's Church (west of the project site) at the intersection of California Street and Grant Avenue is rated "4", an adjacent Church annex on California Street (immediately east of St. Mary's Church) is rated "2", and the 654-70 Grant Avenue building and Nan Kue Chinese School building at 755 Sacramento Street (both west of the project site) are rated "1".

Within a one block radius east of the project site are three rated buildings (see Figure 5, p. 29). The Financial Center building at 405 Montgomery Street, one block east of the site, was constructed in 1927; it is rated "A" by Heritage and is a Category I (retain essentially intact) of the Downtown Plan. Adjacent to and north of the Financial Center building is the Kemper Building, at 417 Montgomery, constructed in 1936. The Kemper Building is rated "C" by Heritage; it is not in Categories I-IV of the Downtown Plan. Neither of these buildings are rated in the 1976 City Planning survey.

Within one block south, southeast, and southwest of the site are seven rated buildings including the California Commercial Union Building, 315 Montgomery, at the northwest corner of Pine and Montgomery Streets (one block southeast of the



NO. ADDRESS	DOWNTOWN PLAN	SPENDID SURVIVORS	DCP SURVEY
1 815 CLAY	-	-	1
2 747 GRANT	-	-	3
3 723 GRANT	-	-	2
4 717 GRANT	-	-	1
5 764 COMMERCIAL	-	-	1
6 757 CLAY	-	-	3
7 750 COMMERCIAL	-	-	3
8 740 COMMERCIAL	-	-	2
9 734 COMMERCIAL	-	-	1
10 730 COMMERCIAL	-	-	2
11 770 SACRAMENTO	-	-	2
12 746-62 SACRAMENTO	-	-	1
13 761 COMMERCIAL	-	-	1
14 755 COMMERCIAL	-	-	3
15 731-49 COMMERCIAL	-	-	2
16 732-34 SACRAMENTO	-	-	0
17 728-30 SACRAMENTO	-	-	2
18 715 COMMERCIAL	-	-	1
19 600-602 KEARNY	-	-	2
20 610-612 KEARNY	-	-	1
21 685-7 COMMERCIAL	-	-	2
22 681-3 COMMERCIAL	-	-	2
23 673-5 COMMERCIAL	-	-	0
24 667-71 COMMERCIAL	-	-	0
25 608 COMMERCIAL (U.S. MINT & SUBTREASURY) (L34)	III	-	3
26 552 MONTGOMERY	I	A	4
27 540-60 MONTGOMERY	IV	C	-
28 564-6 COMMERCIAL	I	B	1
29 559-61 CLAY	IV	C	-
30 553-7 CLAY	IV	C	-
31 554 COMMERCIAL	I	A	0
32 520 MONTGOMERY	-	B	3
33 500 MONTGOMERY	I	B	5
34 569 COMMERCIAL (L142)	I	A	4
35 576 SACRAMENTO	IV	C	-
36 568 SACRAMENTO	IV	B	4

NO. ADDRESS	DOWNTOWN PLAN	SPENDID SURVIVORS	DCP SURVEY
37 560 SACRAMENTO	IV	C	-
38 558 SACRAMENTO	IV	C	-
39 222 LEIDESDORFF (PG&E STATION J)	I	B	3
40 415-29 SANSOME	IV	B	1
41 407-11 SANSOME	I	C	1
42 401-5 SANSOME (SUN BLDG.)	I	C	3
43 790 CALIFORNIA	I	-	-
44 700 CALIFORNIA	-	-	3
45 OLD ST. MARY'S CHURCH	-	-	4
46 654-70 GRANT	-	-	1
47 755 SACRAMENTO	-	-	1
48 615 SACRAMENTO (L146)	III	B	1
49 417 MONTGOMERY	-	C	-
50 405 MONTGOMERY	I	A	-
51 400 MONTGOMERY (L161)	I	A	4
52 345 SANSOME	-	C	1
53 343 SANSOME	III	B	1
54 400 CALIFORNIA (BANK OF CALIFORNIA TEMPLE) (L3)	I	A	5
55 COGSWELL COLLEGE	I	-	4
56 555-97 GRANT	-	-	2
57 501-15 GRANT	-	-	1
58 528-32 GRANT	-	-	1
59 INTERNATIONAL BLDG.	IV	-	-
60 BANK OF AMERICA	-	-	4
61 315 MONTGOMERY	I	A	-
62 300 MONTGOMERY	I	B	1
63 465 CALIFORNIA	I	A	5
64 358-60 PINE	IV	C	-
65 348-54 PINE	I	C	-
66 433 CALIFORNIA	-	A	5
67 340-4 PINE	IV	B	1
68 332 PINE	II	B	-
69 201 SANSOME (L160)	I	A	3
70 217-21 SANSOME	I	C	2
71 231 SANSOME	I	B	1
72 233-41 SANSOME	I	B	1
73 ST. MARY'S ANNEX	-	-	2

(L34) CITY LANDMARK NO.

----- COMMERCIAL-LEIDESDORFF CONSERVATION DISTRICT

———— PINE-SANSOME CONSERVATION DISTRICT (PARTIAL)



600 California Street Federal Home Loan Bank of San Francisco

SOURCES: DOWNTOWN PLAN, SPENDID SURVIVORS, DCP, AND ESA

FIGURE 5 ARCHITECTURAL RESOURCES IN THE PROJECT VICINITY

project site) rated "A" by Heritage, and Category I in the Downtown Plan. This building was not rated in the 1976 City Planning survey. The International Building, directly south across California Street from the project site, was constructed in 1960 and is rated "4" in the 1976 City Planning survey. The building is not rated by Heritage and is not categorized as historically or architecturally significant in the Downtown Plan.

Within one block north, northeast, and northwest of the site, there are 25 rated buildings none of which were rated in the Downtown Plan or Heritage Survey, but which were rated in the City Planning survey. Ratings ranged from "0" for several buildings located on Commercial St. (673-5 Commercial and 667-71 Commercial) to ratings of "3" for four buildings (747 Grant, 757 Clay, 750 Commercial and 755 Commercial).

Within one block west of the site are two rated buildings; the 790 California St. building is rated Category I in the Downtown Plan and the 700 California St. building is rated "3" in the 1976 City Planning Survey.

The project would not affect any architectural resources on the project block or in the project vicinity; this subject will not be discussed in the EIR.

NOTE - Cultural

/1/ Mason Tillman Associates, April 11, 1986, 600 California Street Project, Archival Report. This report is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister Street.

C. <u>OTHER</u>	<u>Yes</u>	<u>No</u>	<u>Discussed</u>	
Require approval of permits from City Departments other than Department of City Planning or Bureau of Building Inspection, or from Regional, State or Federal Agencies?	___	<u>X</u>	___	
D. <u>MITIGATION MEASURES</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Discussed</u>
1) If any significant effects have been identified, are there ways to mitigate them?	<u>X</u>	___	___	<u>X</u>
2) Are all mitigation measures identified above included in the project?	X			

The following are mitigation measures related to topics determined to require no further analysis in the EIR. The EIR will contain a mitigation chapter describing these measures and including other measures which would be, or could be, adopted to reduce potential adverse effects of the project identified in the EIR.

Visual Quality

- In order to reduce obtrusive light or glare, the project sponsor would not use mirrored glass on the building.

Noise

- The project sponsor would require the project contractor to muffle and shield intakes and exhaust, shroud or shield impact tools, and use electric-powered, rather than diesel-powered, construction equipment, as feasible, so that noise would not exceed limits stated in the City's Noise Ordinance (Article 29, San Francisco Administrative Code, 1972).
- The project sponsor would require the general contractor to construct barriers around the site and stationary equipment such as compressors, which would reduce construction noise by as much as five dBA, and to locate stationary equipment in pit areas or excavated areas as these areas would serve as noise barriers.
- As recommended by the Environmental Protection Element of the San Francisco Master Plan, an analysis of noise reduction measurements would be prepared by the project sponsor and recommended noise insulation features could be included as part of the proposed building. For example, such design features could include fixed windows and climate control.

Construction Air Quality

- The project sponsor would require the general contractor to sprinkle demolition sites with water continually during demolition activity; sprinkle unpaved construction areas with water at least twice per day to reduce dust generation by about 50%; cover stockpiles of soil, sand, and other materials; cover trucks hauling debris, soils, sand or other such material; and sweep streets surrounding demolition and

construction sites at least once per day to reduce TSP emissions. The project sponsor would require the general contractor to maintain and operate construction equipment so as to minimize exhaust emissions of TSP and other pollutants by such means as a prohibition on idling motors when equipment is not in use or trucks are waiting in queues, and implementation of specific maintenance programs (to reduce emissions) for equipment that would be in frequent use for much of the construction period.

Geology/Topography

- A detailed foundation and structural design study would be conducted for the building by a California-licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design, excavation and construction of the project.
- If dewatering were necessary, any groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Division of the Department of Public Works, to reduce the amount of sediment entering the storm drain/sewer lines.
- Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the soils report would contain a determination as to whether or not a lateral and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Groundwater observation wells would be installed to monitor the level of the water table and other instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable subsidence were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Cost for the survey and any necessary repairs to service under the street would be borne by the project sponsor.

Water Quality

- See the second measure under Geology/Topography, above, for mitigation proposed to prevent sediment from entering storm sewers.

Energy

Proposed As Part of the Project

- The project would meet the energy requirements of the State Administrative Code Title 24, Part 6, Article 2. Energy Conservation Standards for New Non-Residential Buildings.

Measures Under Consideration by the Project Sponsor

Depending on the final design and energy requirements of the project, the sponsor is considering the following additional conservation measures:

- Use of natural gas for space and hot water heating.
- Multiple light-switching; a variable-air volume air conditioning system; and an outside-air/return-air economizer cycle.
- A carbon monoxide monitoring system to control garage ventilation and avoid unnecessary operation of fans.

Other Measures

- A water economizer cycle system using condenser water to generate chilled water could be installed, so that in hot weather the heat exchangers would cool the water without using excessive amount of electricity.
- The project could incorporate low-flow plumbing to conserve electricity.
- Fluorescent lights with parabolic diffusers could be used to conserve energy and reduce glare. Return-air diffuser slots in light fixtures could reduce air conditioning

loads by removing part of the heat generated by light fixtures. Whenever possible, office suites could be equipped with individualized light switches, and time clock operation to conserve electrical energy.

- The sponsor could perform a thorough energy audit of the structure's actual energy use after the first year of occupancy, and implement all cost effective alterations to the structure's energy system identified in the audit, and make results of the audit available to the City.

Hazards

- An evacuation and emergency response plan would be developed by the project sponsor or building management staff, in consultation with the Mayor's Office of Emergency Services to insure coordination between the City's emergency planning activities and the project's plan and to provide for building occupants in the event of an emergency. The project plan would be reviewed by the Office of Emergency Services and implemented by building management insofar as feasible before issuance of final building permits by the Department of Public Works.
- To expedite implementation of the City's emergency response plan, the project sponsor would prominently post information for building occupants concerning what to do in the event of a disaster.

E. MANDATORY FINDINGS OF SIGNIFICANCE	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
*1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history?		<u>X</u>	

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

*2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	<u>Yes</u> —	<u>No</u> <u>X</u>	<u>Discussed</u> —
*3. Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.)	<u>X</u>	—	<u>X</u>
*4. Would the project cause substantial adverse effects on human beings, either directly or indirectly?	—	<u>X</u>	—
*5. Is there a serious public controversy concerning the possible environmental effect of the project?	—	<u>X</u>	—

The project would contribute to cumulative impacts in the areas of transportation and air quality. The EIR will discuss by reference the analyses for air quality and transportation contained in the Downtown Plan EIR. Those remain valid conservative analyses for future and project conditions.

F. DETERMINATION THAT A TIERED EIR IS REQUIRED

In light of the discussion in this Initial Study, a tiered EIR is required for this project pursuant to the requirements of Section 21094(b) as follows:

1. The project would be consistent with the Downtown Plan, policies and ordinances for which a Final EIR (EE81.3) was certified October 18, 1984;
2. The project would be consistent with applicable local land use plans and zoning pursuant to the Downtown Plan and Planning Code, with allowable exceptions; and,
3. Section 21166 does not apply.

As noted, the EIR cumulative impact analysis will rely on the Downtown Plan EIR (DTPEIR) cumulative impact analysis, and that analysis remains valid. The validity of the DTPEIR assumptions and analysis was recently re-established in the Final EIR (FEIR) for 235 Pine St. (84.432E, certified April 17, 1986). (See material contained in the 235 Pine St. Draft Summary of Comments and Responses, at pp. 9-21, 25-30, 32-38 and 54-59.)

The 235 Pine St. EIR Comments and Responses discuss the current validity of the Downtown Plan EIR assumptions and analysis with regard to development and land use forecasts, employment growth, transportation impacts, office rental and vacancy rates and housing production. The DTPEIR forecasts are considered to be long-term forecasts that focus on the amounts and types of growth expected through the year 2000. No attempt was made to forecast on an annual or short-term basis, and the long-term forecasts include a number of shorter-term ups and downs which average out over time. In general, it was concluded in the 235 Pine FEIR that no new data or information are available that would indicate that the long-term forecasts prepared for the DTPEIR are substantially off-target or misleading. With regard to the more specific issues such as transportation impacts, office vacancy rates, housing impacts, etc., it was concluded that the assumptions in the DTPEIR remain valid and the analysis remains current.

G. ON THE BASIS OF THIS INITIAL STUDY

 I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.

 I find although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers __' in the discussion, have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.

 X I find that the proposed project MAY have a significant effect on the environment, and a tiered ENVIRONMENTAL IMPACT REPORT is required.



Barbara W. Sahm
Environmental Review Officer

for

Dean L. Marcris
Director of Planning

Date: 7/10/86

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Becky Evans

South of Market Alliance

South of Market Association
EOC Office
L. Meyerzove, Chair

Paul Wartelle

Alan Yee

ADJACENT PROPERTY OWNERS

650 California Street Associates
c/o Hogland Bogart & Bertero

580 California Street Ventures
c/o Gerald D. Hines Interests

Sacramento-Kearny Co.

State of California Public
Employees Retirement System

City of San Francisco

California Street Partners
c/o Jim Devoti, Milton Myers Co.

Asco Investment Co. of Sacramento
c/o John Fung

Ching Wong Min & Wong Man
Foon Wong Lok

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APPENDIX B: WIND STUDY METHODOLOGY

This summary of wind study methodology is based on studies by Bruce R. White, Ph.D., Associate Professor of Mechanical Engineering at the University of California, Davis. The studies are independent of the University. These reports are available for review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.

INTRODUCTION

Wind tunnel tests were conducted for winds in the project vicinity in its existing condition and with the project, both in relation to the Downtown Plan wind performance criteria (adopted by the City Planning Commission, November 29, 1984). Wind tunnel measurements and existing weather records for San Francisco were used to predict equivalent mean wind speeds near the project site.^{1/} These mean wind speeds were compared to comfort criteria of 11 mph for pedestrian areas and seven mph for sitting areas, each not to be exceeded more than 10% of the time. Separate calculations were also done to evaluate compliance with the hazard criteria that hourly average wind speeds may not reach or exceed 26 mph for one hour per year.

A 1 inch = 50 feet scale model of the downtown San Francisco area surrounding the proposed building for several blocks in all directions was provided by ESA. The model tested five configurations: existing; project plus existing; a 9:1 FAR alternative; an alternative with a 50-ft. height on Sacramento; and a No Exceptions to Planning Code alternative.

The model was tested in a wind tunnel that allows testing of natural atmospheric boundary layer flows past surface objects such as buildings and other structures. The tunnel has an overall length of 22 meters (m) (72 feet), a test section of 1.22 m (4 feet) wide by 1.83 m (6 feet) high, and an adjustable false ceiling. The adjustable ceiling and turbulence generators allow speeds within the tunnel to vary from 1 to 4 meters per second (m/s) or 4.8 to 19.3 miles per hour (mph).

The wind tunnel study was divided into two parts: flow visualization and wind-speed measurements. The flow visualization observations were performed by injecting a continuous stream of smoke at various near-surface locations. The subsequent motion of the smoke was recorded, and prevailing wind directions were determined. Wind-speed measurements were made with a hot-wire anemometer, an instrument that directly related rates of heat transfer to wind speeds by electronic signals. The hot-wire signals are proportional to the magnitude and steadiness of the wind. Both the mean wind speeds and corresponding turbulence intensities were measured. Thus, high wind speeds and gustiness (changes in wind speeds over short periods of time) could be detected. Hot-wire measurements made close to the surface have an inherent uncertainty of plus or minus (+) five percent of the true values. The ratio of near-surface speed to reference wind speed was calculated from the hot-wire measurements.

Twenty-two test locations were studied for three prevailing wind directions (northwesterly, west-northwesterly and westerly) for the five configurations. These wind conditions are the most common in San Francisco, and are therefore, the most representative for evaluations purposes. The fourth most common wind direction, west-southwesterly, has been found to have quantitatively little impact for areas north of Market St. All hot-wire measurements were taken at the same series of surface points around the building site for the three wind directions and the five cases.

Methodology and Assumptions

The wind ordinance associated with the Downtown Plan (Section 148) is defined in terms of equivalent wind speed. This term denotes an average wind speed (mean velocity), adjusted to include the level of gustiness and turbulence.

The mean wind speeds at street level were determined by a wind tunnel test and a comparison of the test results with statistically representative records of wind data collected atop the Old Federal Building. Data describing the speed, direction and frequency of occurrence of winds were gathered at the old San Francisco Federal Building, at 50 United Nations Plaza, during the six-year period 1945 to 1950. Measurements taken hourly and averaged over one-minute periods have been tabulated for each month (averaged over the six years) in three-hour periods using seven classes of wind speed and 16 compass directions. Analysis of these data shows that during the hours from 6:00a.m. to 8:00pm., about 62% of the winds blow from three of the 16 directions, as follows: Northwest (NW), 10%; West Northwest (WNW), 14%; West (W), 35%; and, all other winds, 36%. Calm conditions occur 2% of the time.

Each wind tunnel measurement results in a ratio that relates the speed of ground-level wind to the speed at the reference elevation, in this case the height of the old San Francisco Federal Building. The wind that is measured is an equivalent wind-speed value which is adjusted to include the level of gustiness or turbulence present.

The frequency with which a particular wind velocity is exceeded at any test location is then calculated by using the measured wind tunnel ratios and a specified ground speed to determine the corresponding reference wind speed for each direction. In general, this gives different reference speeds for each direction (NW, WNW, W, and Other). The wind data for San Francisco are then used to calculate the percentage of the time each reference speed would be exceeded. The sum of these is the total percentage of time that the specified ground-level wind speed is exceeded. A computer is used to calculate the total percentages for a series of wind speeds until the speed corresponding to the speed exceeded 10% of the time is found. Throughout the following discussion, the wind speeds reported refer to the equivalent wind speeds that would be exceeded 10% of the time. This is the time period specified for evaluation of the comfort criteria in the Downtown Plan.

The hazard criterion in the Downtown Plan states that the hourly average wind speed may not reach or exceed 26 mph for one hour per year. The wind data observed at the old San Francisco Federal Building are not full hour average speeds as required by the code, so it is necessary to adjust the equivalent wind speeds to obtain the true hourly average of 26 mph./2/ The adjusted equivalent wind speeds were used to calculate compliance with the hazard criterion.

Study Results

The locations of the measurement points and the results of the wind tunnel study for compliance with the comfort criteria are summarized in Figures B-1 and B-2, pp. A-46 and A-47.

Wind speeds in the existing setting are from seven to 18 mph. The comfort criterion for pedestrians is violated at nine of the 19 locations at which it applies and the comfort criterion for seating area is violated at all three locations at which it applies. Strong winds, with speeds from 11 mph to 16 mph, occur along California St. between Quincy St.

and Spring St., in A.P. Giannini Plaza, and in St. Mary's Square; winds in those three areas exceed the pedestrian comfort criterion in nine locations and exceed the public seating comfort criterion in two locations. Winds along Sacramento St. and mid-block on Kearny St., between California and Sacramento Sts., range from seven mph to 11 mph; winds there meet the pedestrian comfort criterion at all nine locations. The strongest existing wind, 18 mph, occurs on the rooftop of the existing 600 California St. building, where the wind exceeds the public seating comfort criterion and also violates the hazard criterion. Separate calculations indicate that the hazard criterion is violated on the rooftop of the existing 600 California St. building.

The project would result in winds ranging from six to 16 mph. The project would cause winds to decrease at six of the 22 locations, be unchanged at 11 locations, and increase at five locations. The pedestrian comfort criterion would continue to be violated at nine locations, the seating area criterion would continue to be violated at three locations and the project would cause one new exceedance of the pedestrian comfort criterion. Along California St., winds would increase at one location and decrease at two locations; however, winds at the one location on California St. (in front of the Hartford Building) that now meets the 11 mph criterion would exceed that criterion. Winds in A.P. Giannini Plaza would be unchanged, and would continue to exceed the 11 mph criterion. Winds in St. Mary's Square would be unchanged at 12 mph at one location and decrease from 12 to 11 mph in the other; neither location would meet the 7 mph comfort criterion. Winds along Sacramento and Kearny Sts. would be increased at four locations, unchanged at three locations and decreased at two locations; the pedestrian comfort criterion of 11 mph would be met at all nine of those locations. The hazard criterion would not be violated at any of the locations tested with the project in place.

The 9:1 FAR Alternative would result in wind speeds from six to 17 mph. Compared to the existing setting winds would increase at twelve locations, stay the same at four locations, and decrease at six locations. The pedestrian comfort criterion would be violated at eleven locations and the criterion for seating areas would be violated at all three locations. At the ten points along California St., and in A. P. Giannini Plaza, winds would decrease at two locations, be unchanged at two, and increase at six; the pedestrian comfort criterion would be violated at all ten of the these points. Winds would decrease at two of the seating area locations and would be unchanged at one; the comfort criterion would be violated at all three seating area locations. Winds would be increased at six of the remaining eight locations and decreased at two. All would be in compliance with the pedestrian comfort criterion except at the corner of Spring and Sacramento Sts. The hazard criterion would not be violated.

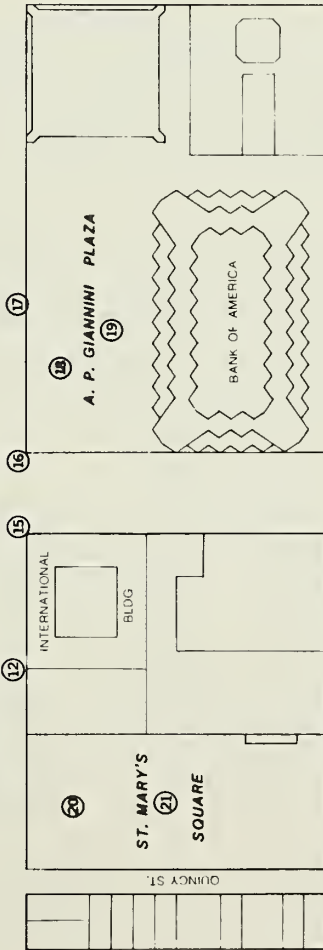
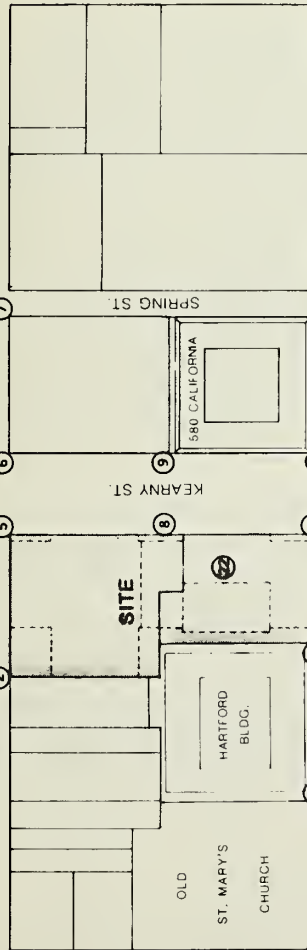
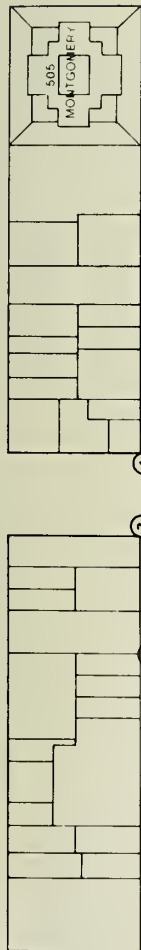
A second alternative, designed with a 50 ft. height on Sacramento Street, would cause winds from seven to 17 mph. Winds would increase at ten locations, remain the same at six locations and decrease at six locations. The pedestrian comfort criterion would be violated at eleven locations and the seating area criterion would be violated at three locations. Along California St. and in A. P. Giannini Plaza winds would decrease at three locations, be unchanged at one, and increase at six. All would violate the pedestrian comfort criterion. The wind speeds in the seating areas in St. Mary's Square would be unchanged and would continue to violate the 7 mph comfort criterion. Winds on the rooftop at 600 California would decrease but would still violate the 7 mph comfort criterion. Away from California St., winds would decrease at two locations, be unchanged at three, and increase at four. All would be in compliance with the pedestrian comfort criterion except at the corner of Spring and Sacramento Sts. The hazard criterion would be violated on the rooftop of the proposed open space of this alternative.

The third alternative, which would require no exceptions to the Planning Code, would cause winds ranging from seven to 17 mph. Winds would increase at 13 locations, remain the same at three, and decrease at six. The pedestrian comfort criterion would be violated at eleven locations and the seating area criterion at three locations. Along California St. and in A. P. Giannini Plaza winds would decrease at two locations, be unchanged at one, and increase at seven; all would remain in violation of the pedestrian comfort criterion. Winds would be unchanged at one location and would increase at one location in St. Mary's Square. Both would continue to be in violation of the seating area criterion. On the rooftop open space area of this alternative, winds would be decreased but would remain in violation of the 7 mph comfort criterion. Winds would decrease at three of the remaining locations, would be unchanged at one, and would increase at five; all would be in compliance with the pedestrian comfort criterion except at the corner of Spring and Sacramento Sts. The hazard criterion would not be violated.

NOTE - Wind Study Methodology

/1/ Equivalent mean wind speed is defined as the mean wind, multiplied by the quantity $(1 + 3 \text{ times the turbulence intensity})$ divided by 1.45.

/2/ Arens, E., "Designing for an acceptable wind environment", Transactions Engineering Journal, ASCE 107, No. TE2, p. 127-141, 1981.



600 California Street
Federal Home Loan Bank of San Francisco

NEAR-SURFACE LOCATIONS FOR
WIND-SPEED MEASUREMENTS

600 California

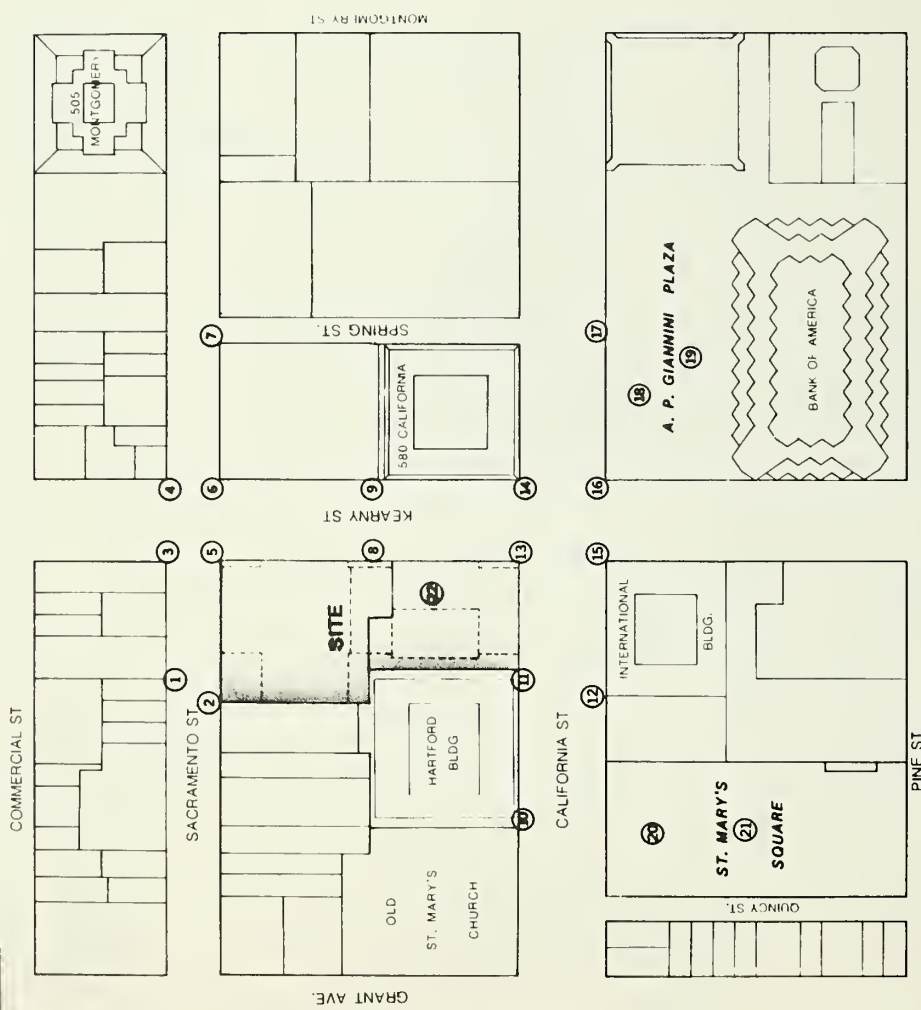
September 1986

FIGURE B- 1. COMFORT CRITERIA EVALUATION FOR PEDESTRIAN-LEVEL WIND SPEEDS (MPH)

At each measurement location, the comfort criterion speed established in Section 148 of the Downtown Plan (11 mph for pedestrian and seven mph for public seating areas, not to be exceeded more than 10% of the time) is given. For each configuration, the wind speed, in mph, exceeded at pedestrian level for 10% of the time is shown. If the comfort criterion for the location is violated, the percentage of time which the comfort criterion is exceeded is stated.

Location	Existing			Project			9:1 FAR Alt.		
	Criterion Speed (mph)	10% Exc. Speed (mph)	% Time Criterion Exceeded	10% Exc. Speed (mph)	% Time Criterion Exceeded	10% Exc. Speed (mph)	10% Exc. Criterion Exceeded	% Time Criterion Exceeded	% Time Criterion Exceeded
no. 1	11	7		9		11			
no. 2	11	8		9		9			
no. 3	11	7		8		8			
no. 4	11	7		6		6			
no. 5	11	8		10		11			
no. 6	11	9		9		10			
no. 7	11	11		11		12			4 %
no. 8	11	9		7		7			
no. 9	11	7		7		7			
no. 10	11	11		15		14			9 %
no. 11	11	15	17 %	14	10 %	14			10 %
no. 12	11	15	18 %	15	15 %	16			21 %
no. 13	11	13	5 %	13	6 %	16			18 %
no. 14	11	14	16 %	14	12 %	15			17 %
no. 15	11	12	3 %	12	4 %	12			4 %
no. 16	11	15	18 %	13	7 %	15			18 %
no. 17	11	13	8 %	13	8 %	14			11 %
no. 18	11	14	11 %	14	11 %	13			11 %
no. 19	11	16	22 %	16	20 %	17			26 %
no. 20	7	12	19 %	12	19 %	11			25 %
no. 21	7	12	27 %	11	19 %	12			25 %
no. 22	7	18	41 %	10	21 %	15			35 %

SOURCE: Environmental Science Associates, Inc.; Bruce White, Ph. D.



600 California Street
Federal Home Loan Bank of San Francisco

NEAR-SURFACE LOCATIONS FOR
WIND-SPEED MEASUREMENTS

600 California September 1986

FIGURE 8- 2. COMFORT CRITERIA EVALUATION FOR PEDESTRIAN-LEVEL WIND SPEEDS (MPH)

At each measurement location, the comfort criterion speed established in Section 148 of the Downtown Plan (11 mph for pedestrian and seven mph for public seating areas, not to be exceeded more than 10% of the time) is given. For each configuration, the wind speed, in mph, exceeded at pedestrian level for 10% of the time is shown. If the comfort criterion for the location is violated, the percentage of time which the comfort criterion is exceeded is stated.

Loca- tion	Crite- rion Speed (mph)	50' on Sacto St.		No Exc. to Code	
		10% Exc. Speed (mph)	% Time Criterion Exceeded	10% Exc. Speed (mph)	% Time Criterion Exceeded
no. 1	11	10		8	
no. 2	11	8		7	
no. 3	11	7		7	
no. 4	11	7		8	
no. 5	11	10		10	
no. 6	11	8		8	
no. 7	11	13	8 %	12	3 %
no. 8	11	8		8	
no. 9	11	9		9	
no. 10	11	14	8 %	13	6 %
no. 11	11	13	7 %	14	13 %
no. 12	11	16	21 %	16	23 %
no. 13	11	14	9 %	15	15 %
no. 14	11	15	19 %	14	16 %
no. 15	11	12	3 %	13	7 %
no. 16	11	14	12 %	14	13 %
no. 17	11	14	11 %	14	12 %
no. 18	11	13	9 %	15	15 %
no. 19	11	17	26 %	17	26 %
no. 20	7	12	20 %	13	30 %
no. 21	7	12	25 %	12	30 %
no. 22	7	15	35 %	13	36 %

SOURCE: Environmental Science Associates, Inc.; Bruce White, Ph. D.

APPENDIX C: TRANSPORTATION

TABLE C-1: PASSENGER LEVELS OF SERVICE ON BUS TRANSIT

<u>Level of Service</u>	<u>Description</u>	<u>Passengers per Seat</u>
A	Level of Service A describes a condition of excellent passenger comfort. Passenger loadings are low with fewer than half the seats filled. There is little or no restriction on passenger maneuverability. Passenger loading times do not affect scheduled operation.	0.00- 0.50
B	Level of Service B is in the range of passenger comfort with moderate passenger loadings. Passengers still have reasonable freedom of movement on the transit vehicle. Passenger loading times do not affect scheduled operations.	0.51- 0.75
C	Level of Service C is still in the zone of passenger comfort, but loadings approach seated capacity and passenger maneuverability on the transit vehicle is beginning to be restricted. Relatively satisfactory operating schedules are still obtained as passenger loading times are not excessive.	0.76- 1.00
D	Level of Service D approaches uncomfortable passenger conditions with tolerable numbers of standees. Passengers have restricted freedom to move about on the transit vehicle. Conditions can be tolerated for short periods of time. Passenger loadings begin to affect schedule adherence, as the restricted freedom of movement for passengers requires longer loading times.	1.01- 1.25
E	Level of Service E passenger loadings approach manufacturers' recommended maximums and passenger comfort is at low levels. Freedom to move about is substantially diminished. Passenger loading times increase as mobility of passengers on the transit vehicle decreases. Scheduled operation is difficult to maintain at this level. Bunching of buses tends to occur, which can rapidly cause operations to deteriorate.	1.26- 1.50
F	Level of Service F describes crush loadings. Passenger comfort and maneuverability are extremely poor. Crush loadings lead to deterioration of scheduled operations through substantially increased loading times.	1.51- 1.60

SOURCE: Environmental Science Associates, Inc. from information in the Interim Materials on Highway Capacity, Transportation Research Circular 212, pp. 73-113, Transportation Research Board, 1980.



M OCEAN VIEW - CIVIC CENTER STATION
Wednesday, September 9, 1981 - 8:20 A.M. - Inbound



L TARAVAL - VAN NESS STATION
Wednesday, September 16, 1981 - 4:50 P.M. - Outbound



14 MISSION - MISSION STREET AND SOUTH VAN NESS AVE
Tuesday, September 29, 1981 - 5:45 P.M. - Outbound



N JUDAH - DUBOCE AND CHURCH
Wednesday, June 8, 1983 - 8:00 A.M. - Inbound

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA



K INGLESIDE - VAN NESS STATION
Wednesday, September 9, 1981 - 8:00 A.M. - Inbound



N JUDAH - VAN NESS STATION
Wednesday, September 16, 1981 - 5:00 P.M. - Outbound



38 GEARY - VAN NESS AVE. AND O'FARRELL ST.
Wednesday October 21, 1981 - 9:00 A.M. - Inbound



38 GEARY - VAN NESS AVE. AND GEARY BLVD.
Wednesday, October 21, 1981 - 4:20 P.M. - Outbound

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE C-1(CONTINUED)
PHOTOS OF MUNI PEAK LOADING CONDITIONS



30X MARINA EXPRESS - BAYSHORE AVE. AND ARIETA AVE.
Wednesday, October 7, 1981 - 8:00 A.M. - Inbound



J CHURCH - CHURCH ST. AND DUBOCE AVE.
Tuesday, September 29, 1981 - 9:00 A.M. - Inbound

600 California Street
Federal Home Loan Bank of San Francisco

SOURCE: ESA

FIGURE C-1 (CONTINUED)
PHOTOS OF MUNI PEAK LOADING CONDITIONS

PEDESTRIAN ANALYSIS

The pedestrian analysis has been conducted following methods developed by Pushkarev and Zupan in Urban Space for Pedestrians (MIT Press, 1975). Table C-1 shows the relationship between pedestrian flow rates and the flow regimes (categories) used to describe levels of operation. Figure C-2 shows photographs of pedestrian conditions that correspond to the flow regimes.

TABLE C-2: PEDESTRIAN FLOW REGIMEN

<u>Flow Regime/a/</u>	<u>Choice</u>	<u>Conflicts</u>	<u>Flow Rate (p/f/m)/b/</u>
Open	Free Selection	None	less than 0.5
Unimpeded	Some Selection	Minor	0.5 to 2.0
Impeded	Some Selection	High Indirect Interaction	2.1 to 6.0
Constrained	Some Restriction	Multiple	6.1 to 10.0
Crowded	Restricted	High Probability	10.1 to 14.0
<u>Design Limit - Upper Limit of Desirable Flow</u>			
Congested	All Reduced	Frequent	14.1 to 18.0
Jammed	Shuffle Only	Unavoidable	Not applicable/c/

/a/ Photographs of these conditions are shown in Figure C-2.

/b/ P/F/M = Pedestrians per foot of effective sidewalk width per minute.

/c/ For Jammed Flow, the (attempted) flow rate degrades to zero at complete breakdown.

SOURCE: Urban Space for Pedestrians, MIT Press, 1975, Cambridge, MA.

JAMMED FLOW. Space per pedestrian in this view is about 3.8 sq ft (0.35 m²). This is representative of the lower half of the speed-flow curve, where only shuffling movement is possible and even the extremely un-

comfortable maximum flow rate of 25 people per min per ft (82 per m) of walkway width cannot be attained due to lack of space. Photograph by Louis B. Schlivck.



The threshold of **CONGESTED FLOW**. The first eleven people in the view have about 16 sq ft (1.5 m²) per person, corresponding to a flow rate of about 15 people per min per ft (49 per m) of walkway width. The beginnings of congestion are evident in bodily conflicts affecting at least three of the walkers, and in blocked opportunities for walking at a normal pace.



The onset of **CROWDED FLOW**, with an average of about 24 sq ft (2.2 m²) per person, or a flow rate of about 10 people per min per ft (33 per m) of walkway width. Choice of speed is partially restricted, the probability of conflicts is fairly high, passing is difficult. Voluntary groups of two, of which two can be seen in the picture, are maintained, but cause interference. Note also some overflow into the vehicular roadway in the background.



The midpoint of the **CONSTRAINED FLOW** range, with about 30 sq ft (2.8 m²) per person, or a flow rate of about 8 people per min per ft (26 per m) of walkway width. The choice of speed is occasionally restricted, crossing and passing movements are possible, but with interference and with the likelihood of conflicts. The man in the dark suit seems to be able to cross in front of the two women in the foreground quite freely, but in the background near the curb people are having difficulty with passing maneuvers.

600 California Street
Federal Home Loan Bank of San Francisco

FIGURE C-
PHOTOS OF PEDESTRIAN FLOW LEVELS

SOURCE: Pushkarev and Zupan



The borderline between IMPEDED and UNIMPEDED FLOW, with about 130 sq ft (12 m^2) per person, or a flow rate of about 2 people per min per ft (6.5 per m) of walkway width. Individuals as well as couples visible in this view have a choice of speed and direction of movement. This rate of flow is recommended for design of outdoor walkways in office districts and other less dense parts of downtown areas.



The uneven nature of UNIMPEDED FLOW. While the people walking in the plaza—which is 17 ft (5.2 m) wide, compared to 23 ft (7 m) in the preceding picture—have almost 130 sq ft (12 m^2) per person on the average, the space allocation for the eight individuals in the foreground is closer to 70 sq ft (6.4 m^2). Thus, indirect interaction with others is still quite frequent in the upper range of UNIMPEDED FLOW.

The midpoint of the IMPEDED FLOW range, with about 75 sq ft (6.9 m^2) per person, or a flow rate of about 4 people per min per ft (13 per m) of walkway width. Physical conflicts are absent, but pedestrian navigation does require constant indirect interaction with others. This rate of flow is recommended as an upper limit for the design of outdoor walkways in shopping districts and other dense parts of downtown areas.



Lower range of UNIMPEDED movement, approaching OPEN FLOW. About 350 sq ft (32.2 m^2) per person, or a flow rate of less than 1 person per min per ft (3.3 per m) of walkway width. Complete freedom to select the speed and direction of movement; individuals behave quite independently of each other. For a design standard based solely on pedestrian density, this amount of space can be considered excessive.

100 California Street
Federal Home Loan Bank of San Francisco

FIGURE C-2 (CONTINUED)
PHOTOS OF PEDESTRIAN FLOW LEVELS

SOURCE: Pushkarev and Zupan

INTERSECTION ANALYSIS

The capacity analysis of each intersection at which a turning movement count was made used the "critical lane" method. This method of capacity calculation is a summation of maximum conflicting approach lane volumes that gives the capacity of an intersection in vehicles per hour per lane. (This method is explained in detail in an article entitled "Intersection Capacity Measurement Through Critical Movement Summations: A Planning Tool," by Henry B. McNerney and Stephen G. Peterson, January 1971, Traffic Engineering. This method is also explained in "Interim Materials on Highway Capacity", Transportation Research Circular No. 212, Transportation Research Board, January 1980). The maximum service volume for Level of Service E was assumed as intersection capacity. A service volume is the maximum number of vehicles that can pass an intersection during a specified time period in which operating conditions are maintained corresponding to the selected and specified Level of Service (see Table C-3). For each intersection analyzed, the existing peak-hour volume was computed and a volume-to-capacity (v/c) ratio calculated by dividing the existing volume by the capacity at Level of Service E.

PARKING SURVEY ANALYSIS OF EXISTING GARAGE

Environmental Science Associates conducted a survey of the existing 525 Kearny St. garage, to determine the number of parking spaces used for long- and for short-term parking. Long-term parking is identified by the Department of City Planning as any vehicle remaining in a parking space for four hours or more, short-term parking is for less than four hours.

The rate structure for the existing garage is \$5.00/day no matter how long the vehicles stay in the garage.

The survey was conducted by ESA on Wednesday, May 21, 1986, between the hours of about 9:00 a.m. and 5:00 p.m., a total of eight hours. A total of 240 spaces were noted in the garage, and each space was surveyed about once every hour; the garage was designed for 201 vehicles; however, due to the smaller vehicles and double parking, this larger number can be accommodated. License plates were noted each time a space was surveyed to determine if the space was occupied by the same or a different car at each consecutive hour. (Raw survey data is on file and available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister St.)

During the survey period, a total of 192 spaces were used for long-term parking (four or more hours) and a total of 48 spaces were used for short-term parking (less than four hours). The parking turnover rate per hour, averaged over the eight-hour period was 0.2, meaning that 20% of the spaces turned over once an hour.

TABLE C-3: VEHICULAR LEVELS OF SERVICE AT SIGNALIZED INTERSECTIONS

Level of Service	Description	Volume/Capacity (v/c) Ratio/a/
A	Level of Service A describes a condition where the approach to an intersection appears quite open and turning movements are made easily. Little or no delay is experienced. No vehicles wait longer than one red traffic signal indication. The traffic operation can generally be described as excellent.	less than 0.60
B	Level of Service B describes a condition where the approach to an intersection is occasionally fully utilized and some delays may be encountered. Many drivers begin to feel somewhat restricted within groups of vehicles. The traffic operation can generally be described as very good.	0.61-0.70
C	Level of Service C describes a condition where the approach to an intersection is often fully utilized and back-ups may occur behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so. The driver occasionally may have to wait more than one red traffic signal indication. The traffic operation can generally be described as good.	0.71-0.80
D	Level of Service D describes a condition of increasing restriction causing substantial delays and queues of vehicles on approaches to the intersection during short times within the peak period. However, there are enough signal cycles with lower demand such that queues are periodically cleared, thus preventing excessive back-ups. The traffic operation can generally be described as fair.	0.81-0.90
E	Capacity occurs at Level of Service E. It represents the most vehicles that any particular intersection can accommodate. At capacity there may be long queues of vehicles waiting upstream of the intersection and vehicles may be delayed up to several signal cycles. The traffic operation can generally be described as poor.	0.91-1.00
F	Level of Service F represents a jammed condition. Back-ups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration. Hence, volumes of vehicles passing through the intersection vary from signal cycle to signal cycle. Because of the jammed condition, this volume would be less than capacity.	1.01+

/a/ Capacity is defined as Level of Service E.

SOURCE: San Francisco Department of Public Works, Traffic Division, Bureau of Engineering from Highway Capacity Manual, Highway Research Board, 1965

TABLE C-4: TRAFFIC LEVELS OF SERVICE FOR FREEWAYS

<u>Level of Service</u>	<u>Description</u>	<u>Volume/Capacity (v/c) Ratio/a/</u>
A	Level of Service A describes a condition of free flow, with low volumes and high speeds. Traffic density is low, with speeds controlled by driver desires, speed limits, and physical roadway conditions. There is little or no restriction in maneuverability due to the presence of other vehicles, and drivers can maintain their desired speeds with little or no delay.	0.00- 0.60
B	Level of Service B is in the higher speed range of stable flow, with operating speeds beginning to be restricted somewhat by traffic conditions. Drivers still have reasonable freedom to select their speed and lane of operation. Reductions in speed are not unreasonable, with a low probability of traffic flow being restricted.	0.61- 0.70
C	Level of Service C is still in the zone of stable flow, but speeds and maneuverability are more closely controlled by the higher volumes. Most of the drivers are restricted in their freedom to select their own speed, change lanes, or pass. A relatively satisfactory operating speed is still obtained.	0.71- 0.80
D	Level of Service D approaches unstable flow, with tolerable operating speeds being maintained though considerably affected by changes in operating conditions. Fluctuations in volume and temporary restrictions to flow may cause substantial drops in operating speeds. Drivers have little freedom to maneuver, and comfort and convenience are low, but conditions can be tolerated for short periods of time.	0.81- 0.90
E	Level of Service E cannot be described by speed alone, but represents operations at even lower operating speeds (typically about 30 to 35 mph) than in Level D, with volumes at or near the capacity of the highway. Flow is unstable, and there may be stoppages of momentary duration.	0.91- 1.00
F	Level of Service F describes forced flow operation at low speeds (less than 30 mph), in which the freeway acts as storage for queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially and stoppages may occur for short or long periods of time because of downstream congestion. In the extreme, both speed and volume can drop to zero.	1.00+

/a/ Capacity is defined as Level of Service E.

SOURCE: Environmental Science Associates, Inc. from information in the Highway Capacity Manual, Special Report 87, Highway Research Board, 1965.

APPENDIX D: AIR QUALITY

TABLE D-1: SAN FRANCISCO AIR POLLUTANT SUMMARY, 1982-1985

STATION: 900 23rd Street, San Francisco

POLLUTANT:	STANDARD	1982	1983	1984	1985
OZONE (O₃) (Oxidant)					
1-hour concentration, ppm/a/					
Highest hourly average	0.10 /b/ 0.12 /c/	0.08	0.13	0.10	0.09
Number of excesses of state standard		0	1	1	0
Expected Annual Excess (federal)/d/		0.0	0.3	0.3	-
CARBON MONOXIDE (CO)					
1-hour concentration, ppm					
Highest hourly average	20 /b,e/	12	7	11.0	10.0
Number of excesses of standard		0	0	0	0
8-hour concentration, ppm					
Highest 8-hour average	9 /b,c/	9.1	5.1	7.7	7.1
Number of excesses of standard		1	0	0	0
TOTAL SUSPENDED PARTICULATE (TSP)					
24-hour concentration, ug/m ³ /a/					
Highest 24-hour average	100 /b,f/	126	117	152	158
Number of excesses of standard/g/		3	4	5	5
Annual concentration, ug/m ³					
Annual Geometric Mean	60 /b,f/	57	55	60	62
Annual excess of standard		No	No	Yes	Yes
LEAD (Pb)					
30-day concentration, ug/m ³					
Highest 30-day average	1.5 /b/	0.7	0.4	0.7	0.3
Number of excesses of standard		0	0	0	0
NITROGEN DIOXIDE (NO₂)					
1-hour concentration, ppm					
Highest hourly average	0.25 /b/	0.13	0.13	0.14	0.18
Number of excesses of standard		0	0	0	0
SULFUR DIOXIDE (SO₂)					
24-hour concentration, ppm					
Highest 24-hour average	0.05 /b/	0.012	0.018	0.03	0.07
Number of excesses of standard/g,h/		0	0	0	0

/a/ ppm: parts per million. ug/m³: micrograms per cubic meter.

/b/ State standard, not to be equaled or exceeded, except for CO standards, which are not to be exceeded.

(Continued)

TABLE D-1: SAN FRANCISCO AIR POLLUTANT SUMMARY 1982-1985 (Continued)

-
- /c/ Federal standard, not to be exceeded more than once per year, except for annual standards, which are not to be exceeded.
- /d/ Expected Annual Excess is a three-year average of annual excesses of the federal standard.
- /e/ The state one-hour CO standard was revised from 35 ppm to 20 ppm in January 1983. The federal one-hour standard remains 35 ppm.
- /f/ The California ARB has redefined the state particulate standard to apply to "inhalable" particulates only (i.e., those which have a diameter less than ten microns). The new standards are 50 ug/m^3 for 24-hour averages and 30 ug/m^3 for the annual geometric mean. No data is currently available on the particle size distribution of the TSP sampled at the San Francisco monitoring station.
- /g/ Number of observed excess days (measurements taken once every six days).
- /h/ Exceeding the SO_2 standard is a violation only if a concurrent excess of the state ozone or TSP standards occurs at the same station. Otherwise, the federal standard of 0.14 ppm applies.

SOURCE: BAAQMD, 1981 - 1983, Air Quality in the San Francisco Bay Area; and California ARB, 1982 - 1985, California Air Quality Data.

APPENDIX E: TYPICAL NOISE LEVELS

TABLE E-1: TYPICAL NOISE LEVELS

	<u>Decibels</u>	
	110	Pile driver (from 50 feet)
Very Loud	100	
		Light helicopter take-off (from 125 feet)
	90	
		Diesel truck (from 50 feet)
	80	
Loud		Radio or TV playing in Living Room
	70	
		Passenger car on city street (from sidewalk)
	60	
Quiet	50	
	40	
Very Quiet		Whisper
		Rustle of paper
	30	

SOURCE: Department of City Planning, "A Proposal for Citizen Review: Transportation Noise, Environmental Protection Element of the Comprehensive Plan of San Francisco," August, 1984.
